

**From:** <TFKing106@aol.com>  
**To:** <NRCREP@nrc.gov>  
**Date:** Mon, Oct 24, 2005 12:15 PM  
**Subject:** Comments on Draft EIS, American Centrifuge Plant, Piketon, OH, NUREG-1834

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Consultation, training, and textbooks in cultural resource management

Date: October 24, 2005

To: Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington DC 20555-0001

Via email to \_NRCREP@nrc.gov\_ (mailto:NRCREP@nrc.gov)

I write to comment on your draft Environmental Impact Statement for the Proposed American Centrifuge Plant in Piketon, Ohio, NUREG-1834, published in August 2005 (hereinafter, DEIS). These comments are transmitted electronically to the NRC at its specified email address on October 24, 2005, within the comment period specified in the DEIS. My comments will be restricted to the manner in which the DEIS addresses "cultural resources." My qualifications for offering the comments I do are outlined in the attached resume.

#### Qualifications of EIS analyst:

The list of preparers given on pages 10-1 through 10-3 identifies only one individual as responsible for the analysis of impacts on "historic and cultural resources." That individual, Dr. Polly McW. Quick, is to my knowledge a specialist in the prehistoric archaeology of central California, who according to promotional literature from her employer, ICF Consulting, has in the last 30 years worked primarily on environmental remediation programs and development projects in Iceland, Brazil, Costa Rica, and California. Please explain the basis upon which she is regarded as qualified to analyze the impacts of the American Centrifuge Plant on prehistoric and historic "cultural resources" in Ohio.

#### Section 3.3:

This section begins with a definition of the term "cultural resources." This is an important definition, since it limits the range of phenomena upon which impacts are analyzed. Please explain the basis for this definition, whose source is not cited and which I do not believe is based on any United States or international guidance. Please note the concerns expressed and recommendations provided by UNESCO in its Convention for the Safeguarding of the Intangible Cultural Heritage -- 2003.

Near the bottom of page 3-5 the review process under Section 106 of the National Historic Preservation Act is inaccurately characterized as a process "done in consultation with the State Historic Preservation Officer;" later, passing reference is made to "provid(ing) Indian tribes the opportunity to

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identify concerns." In fact, the Section 106 regulations (36 CFR 800) make it abundantly clear that the process is done in consultation with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officers, Indian tribes, and other interested parties. The NRC staff seems to have difficulty understanding that the regulations require actually communicating with, listening to, and discussing the concerns of interested parties; the failure to engage in such consultation is at the heart of the DEIS' inadequacies. Please re-read the Section 106 regulations and relevant guidance from the Advisory Council on Historic Preservation and the Secretary of the Interior, and recast your discussion to accurately reflect their direction.

On page 3-6, the DEIS discusses an "area of potential effects" (APE) defined by the NRC staff for the project. This APE appears to be based solely on the potential for direct and selected indirect physical effects. I see no evidence that direct or indirect visual, auditory, olfactory, or other non-physical effects were given any consideration, nor do I see any evidence that cumulative effects on "cultural resources" of any kind were considered, in defining the APE. Please reconsider your APE with reference to all types of potential effects.

The discussion of historic properties that takes up the remainder of this section is overwhelmingly weighted toward specific archaeological sites and historic structures. Particularly given the proximity of the project site to the Scioto Township Works, and the extensive cultural landscape modifications represented by such earthworks, it seems strange that so little consideration seems to have been given to cultural landscapes, and to relict landforms that may reflect such landscapes amid the damage caused to the area in the past by the DOE Reservation. Please consider attempting a more coherent, landscape-based approach to analysis of the area's historic properties.

On page 3-9 we are told that unidentified "(i)nvestigators" determined that 22 of the 36 previously unidentified archaeological sites "did not meet National register eligibility criteria." Upon what basis or bases were these determinations made, and how were the "investigators" qualified to make them? How were Indian tribes and other interested parties consulted in the course of these evaluations? The same questions pertain to the evaluation discussed in the final paragraph on this page.

Please explain how NRC has completed its responsibilities under the Archaeological and Historic Preservation Act of 1974 (16 USC 469-469c-2) with respect to the individual archaeological sites discussed in this section, and with respect to the prehistoric cultural landscape of which they are arguably parts.

How were interested parties consulted during the evaluation of the Gaseous Diffusion Plant discussed on page 3-10?

Section 3.3.4 on page 3-10 mentions in passing that the Barnes House, adjacent to the project area, is associated with the location where the last passenger pigeon was reportedly killed. This suggests that this representative of a famous species that figured significantly in American conservation history may have been killed within or near the project area, but I see no evidence that this possibility was in any way considered in your analysis. Clearly, the landscape within which the last passenger pigeon was killed would very likely be eligible for inclusion in the National Register of Historic Places. Please address this possibility, and the possible impacts of the project on this landscape.

The discussion of the Barnes House is confusing. If it is adjacent to the boundary of the reservation, it would seem that it must be subject to at least possible visual, auditory, or other non-physical effects, and impacts on its use, if not long-term physical impacts. Please explain why NRC has not evaluated its eligibility for the National Register, and considered possible effects on it. What is the relevance of the SHPO's recommendation to the property owner regarding nomination to the National Register?

Section 3.3.5 indicates that the Absentee Shawnee Tribe has indicated a concern about the Scioto Township Works and perhaps other earthworks in the area, but I see no evidence that the Tribe has been consulted about this concern. There are copies of letters to various tribes appended to the DEIS (Appendix B), but these do not represent consultation; they merely inquire about whether the tribes have "specific knowledge of any sites that you believe have traditional religious and cultural significance." Please review pertinent guidance from the Advisory Council on Historic Preservation, the National Register of Historic Places, and the U.S. Environmental Protection Agency's Interagency Native American Environmental Justice Task Force, and explain your consultation with with potentially concerned Indian tribes with reference to such guidance.

The purpose of Section 3.3.6 is unclear. Please explain what information this section, as opposed to those preceding it, is supposed to convey. Please explain what you mean by a "potential historic property." What property is NOT "potentially" historic?

Section 4.2.3:

The highlighted text at the top of page 4-5 further describes the APE as NRC has defined it, but provides no justification for it, and like the previous description appears to deny the possibility of any kind of other-than-physical impact. Please reconsider your APE definition with reference to contemporary best practice.

Section 4.2.2.1 first suggests that various activities could have effects on historic properties by destroying or altering contributing elements of the Gaseous Diffusion Plant, but then vaguely implies that such effects will be "properly controlled" and hence will have "no effect." This is not a possible determination under the Section 106 regulations. The regulations permit "conditional" determinations of "no adverse effect," but not conditional determinations of "no effect" (strictly speaking, determinations of "no historic properties subject to effect"). If you have actual procedures to put in place, developed in consultation with the SHPO and other interested parties, by which to "properly control" damage or destruction of historic properties and their elements, then perhaps you can determine that there will be no adverse effect, but not no effect. Please re-read 36 CFR 800.5 and reconsider this section.

The next paragraph is even vaguer about NRC's determination with respect to the archaeological sites, and continues to express total ignorance of any cultural landscape values or traditional cultural values that may be ascribed to the landscape by Indian tribes or others. Again, please review pertinent regulations and guidance and reconsider this paragraph.

At the top of page 4-6 the NRC staff concludes that there will be no effect

on the Scioto Township Works, but it does so (a) without any clear definition of the actual boundaries of the Works or their possible relationship to other cultural landscape features, and (b) without any consultation with the Absentee Shawnee or other tribes that may (and in the case of the Absentee Shawnee, say they do) ascribe cultural significance to the Works and other landscape features in the area. As requested above, please review pertinent Advisory Council, National Register, and EPA guidance and reconsider this casual dismissal of effects on the site.

The next paragraph, on the Barnes House, is equally peculiar. Here we have NRC confidently asserting that the Barnes House may be eligible for the National Register only under National Register Criteria A and C, and casually assuring the reader that the project cannot affect the attributes that may make it eligible under these criteria, when it has provided no evidence that it has performed any sort of analysis of the Barnes House's eligibility -- suggesting instead that it is the property owner's responsibility to nominate the place to the National Register. As far as I can tell, you have developed no basis whatever to say anything about the eligibility of the Barnes House, the elements that may contribute to that eligibility, or the effects of the project (direct, indirect, or cumulative) on such elements. Please develop such a basis, in consultation with interested parties and in a manner consistent with pertinent guidance, and try again.

Section 4.2.2.2 seems to be predicated on the assumption that the only possible "indirect" effects of facility operation would be vandalism by workers within the facility boundaries. Please explain the rationale for this assumption. Will there be no other long-term indirect or cumulative effects on the local environment that might alter historic properties? Why should vandal workers stay within the fence? Why does NRC staff consider only the "information values" of the Scioto Township Works, considering that the Absentee Shawnee Tribe, at least, has indicated concerns that may well go beyond information values?

Throughout this section, potential impacts are referred to as "SMALL." What does this mean with reference to (a) the significance of impacts under NEPA and (b) the criteria of adverse effect found in 36 CFR 800?

Section 4.2.9:

This section, on environmental justice, gives no consideration whatever to disproportionate adverse environmental impacts on the cultural interests of such minority (and probably low-income) groups as the Absentee Shawnee and other tribes. Please review pertinent EPA guidance and address these impacts.

Section 4.3:

This section, on cumulative impacts, is notable for its utter lack of treatment of effects on historic properties or any other kinds of "cultural resources." This is particularly striking considering that the reservation on which the project is proposed has clearly had very serious impacts on the cultural landscape of which the Scioto Township Works are a part. A cumulative impact analysis is supposed to consider the effects (even the "SMALL" effects) of the project under review in the context of other past, present, and reasonably foreseeable future actions. Serious impacts on the cultural character of the area that includes the project APE (however defined) have obviously taken place in the past; they may be going on in the present, and what the future

holds remains to be analyzed. Please address the cumulative impacts of the project on cultural resources of all kinds, notably including historic properties.

#### Appendices

Appendix B contains several form letters to Indian tribes asking them about "specific knowledge of any sites" that they believe "have traditional religious and cultural significance." The text indicates that the Absentee Shawnee reported knowledge of such a site -- the Scioto Township Works -- though the documentation expressing this concern, supposed to be in Appendix B, is not there. In any event, the letters do not reflect any sort of real consultation with the tribes; they are mere formletters that do not seem to have been followed up in any way. Please review the findings of the Tenth Circuit Court of Appeals in *Pueblo of Sandia v. United States*, 50 F.3d 856 (10th Cir. 1995), as well as pertinent Advisory Council, National Register, and EPA guidance, and initiate real consultation with tribes.

Appendix B also includes correspondence with the SHPO in which the SHPO suggests a variety of representations, studies and consultations that NRC should undertake. It is not clear what, if anything, NRC has done in response to these suggestions.

Appendix B also contains a letter to the Advisory Council on Historic Preservation in which NRC mentions, rather in passing, that it intends to "use the NRC's NEPA review processes for Section 106 purposes," and later indicates that the former will be used "in lieu of" the latter. This suggests an attempt by NRC to comply with 36 CFR 800.8(c) and substitute its NEPA compliance for completion of standard Section 106 review, but NRC has done virtually none of the things that 36 CFR 800.8(c) requires in order to effect such a substitution. It has notified the Advisory Council of its attempt to substitute, but I see no evidence that it has similarly notified the SHPO. The notification to the Advisory Council came only very late in the NEPA process, and in such a stealthy way (a short, vague paragraph buried in the middle of a longer missive) that it is easy to imagine the Council misunderstanding its intent. More importantly, NRC has engaged in virtually none of the consultation with interested parties required by 36 CFR 800.8(c), and there are, as indicated above, many questions about the quality of its efforts to identify and address historic preservation issues. I strongly suggest that you abandon your attempt to substitute your NEPA compliance for standard Section 106 review, and initiate proper consultation with all concerned parties in accordance with 36 CFR 800.4.

Beyond properly complying with Section 106 of the National Historic Preservation Act, I suggest your attention to Section 110(d) of the same statute, to the requirements of the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act, the Native American Graves Protection and Repatriation Act and its implementing regulations (43 CFR 10), Executive Order 13175, and Executive Order 13352, and to the requirement of 40 CFR 1508.27(b)(3) and (8) that effects on cultural resources -- NOT only National Register eligible historic properties -- be considered in determining the significance of environmental impacts.

The overwhelming impression conveyed by the DEIS with respect to "cultural resources" is one of ignorant dismissal. It appears that the NRC staff and the DEIS authors have convinced themselves that there will be no impact on

anything of importance, and has then written the DEIS to demonstrate that this is the case. The demonstration, however, is a perfectly amateurish one. I devoutly hope that the DEIS is not similarly flawed with respect to other kinds of environmental impacts; if it is, it would speak very poorly for NRC's attention to its responsibilities toward the public and the environment.

Thank you for the opportunity to comment; I look forward to your responses.

Sincerely,

Thomas F. King, PhD

cc: OH SHPO  
ACHP  
National Trust for Historic Preservation  
Geoffrey Sea

CC: <tmcculloch@achp.gov>, <Betsy\_Merritt@nthp.org>, <dsnyder@ohiohistory.org>, <SargentsPigeon@aol.com>

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**Subject:** Comments on Draft EIS, American Centrifuge Plant, Piketon, OH,  
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**Creation Date:** Mon, Oct 24, 2005 12:14 PM

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**Options**

<b>Expiration Date:</b>	None
<b>Priority:</b>	Standard
<b>Reply Requested:</b>	No
<b>Return Notification:</b>	None

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**Security:**

No  
Standard



## **Thomas F. King, PhD**

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Professional Resumé

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*Cultural Resource Impact Assessment and Negotiation, Writing, Training*

### **Employment**

*Presently:* Private consultant, educator, writer, facilitator in cultural resource management and environmental review; Trainer/Consultant, SWCA Environmental Consultants; Archeologist, The International Group for Historic Aircraft Recovery Amelia Earhart Project. Member, Sussex Archaeological Executive, advising the Government of Great Britain regarding archaeological recovery of HMS *Sussex* off Gibraltar.

*Formerly:* Senior Instructional Consultant, National Preservation Institute. Expert consultant to U.S. General Services Administration, program director for Advisory Council on Historic Preservation, Consultant to the High Commissioner, Trust Territory of the Pacific Islands, Archeologist with the National Park Service, consulting archeologist, head of archeological surveys at San Francisco State University, UCLA, University of California Riverside.

### **Education**

*PhD*, University of California, Riverside, Anthropology, 1976.

*BA*, San Francisco State University (then College), Anthropology, 1968.

*Certificate:* Mediator, Bowie State University Center for Alternative Dispute Resolution, 1997.

### **Recent and current Clients**

*Government Agencies:* Bureau of Land Management California State Office; Bakersfield Field Office; USDA Forest Service. USDA Farm Service Agency, U.S. Fish and Wildlife Service. U.S. Navy, U.S. Air Force, U.S. Army, Federal Aviation Administration. Grand Canyon Monitoring and Research Center. City of Newport News, Virginia.

*Indian Tribes and Organizations:* Klamath River Intertribal Fish and Water Commission; Mole Lake Sokaogon Community of Lake Superior Chippewa Indians; Bad River and Red Cliff Bands of Lake Superior Tribe of Chippewa Indians. Hualapai Tribe. Quechan Indian Nation. Round Valley Indian Tribes. Penobscot Tribe.

*Private Sector:* Blythe Energy Corp., Cingular Wireless. Odyssey Marine Exploration.

*Non-profit organizations:* National Preservation Institute.

## Thomas F. King: Courses Taught

Short courses for SWCA Environmental Consultants, National Preservation Institute, University of Nevada, Reno, General Services Administration, Advisory Council on Historic Preservation, Environmental Protection Agency, National Park Service, and Department of Defense in cultural resource law and policy, Section 106 review, National Environmental Policy Act implementation, identification and protection of traditional cultural properties, Native American consultation, environmental justice, conflict resolution, and related subjects.

## Thomas F. King: Publications (Selected)

### *Books and Monographs*

- *Doing Archaeology: a Cultural Resource Management Perspective*. Left Coast Press 2005.
- *Cultural Resource Laws and Practice: An Introductory Guide*. AltaMira Press 2004 (First edition 1998)
- *Amelia Earhart's Shoes*. With R. Jacobson, K. Burns, and K. Spading. AltaMira Press, 2004 (First edition 2001).
- *Places that Count: Traditional Cultural Properties in Cultural Resource Management*. AltaMira Press 2003
- *Thinking About Cultural Resource Management: Essays From the Edge*. AltaMira Press 2002.
- *Federal Projects and Historic Places: the Section 106 Process*. AltaMira Press, 2000
- *Piseken Nóómw Nóón Tonaachaw: Archeology in the Tonaachaw Historic District, Moen Island, Truk*. With P.L. Parker, Southern Illinois University, Carbondale and Micronesian Archeological Survey, Saipan 1984.
- *Anthropology in Historic Preservation*. With P.P. Hickman and G. Berg, Academic Press, New York 1977.
- *The Archeological Survey: Methods and Uses*. Interagency Archeological Services, Heritage Conservation and Recreation Service (National Park Service), Department of the Interior, Washington DC 1977 (Republished 2003 by California Division of Forestry).

### *Articles*

- Considering the Cultural Importance of Natural Landscapes in NEPA Review: The *Mushgigagamongsebe* Example. *Environmental Practice* 5:4, Oxford University Press, 2003
- "I Learned Archaeology From Amelia Earhart: Using a Famous Mystery to Teach Scientific Methods." In *Strategies for Teaching Anthropology*, 3<sup>rd</sup> Edition, Patricia Rice and David McCurdy, eds., Prentice Hall, New York; 2003..
- "Cultural Resources in an Environmental Assessment Under NEPA." *Environmental Practice* 4(3):137-144, National Association of Environmental Professionals, September 2002.

- "Historic Preservation Laws" in *Encyclopedia of Life Support Systems*. EOLSS Publishers for UNESCO, 2002.

*Articles (continued)*

- "What Should Be the 'Cultural Resources' Element of an Environmental Impact Assessment?" *Environmental Impact Assessment Review* 20(2000):5-30, 2000.
- "Archaeology in the Search for Amelia Earhart." With Richard Gillespie. In *Lessons from the Past: An Introductory Reader in Archaeology*, Kenneth L. Felder, ed., Mayview Press, Mountain View CA, 1999
- "How the Archeologists Stole Culture: a Gap in American Environmental Impact Assessment and What to Do About It." *Environmental Impact Assessment Review*, January 1998.
- "The Nature and Scope of the Pothunting Problem." In *Protecting the Past: Readings in Archaeological Resource Management*. J.E. Ehrenhard and G.S. Smith, eds., The Telford Press, Caldwell NJ 1991.
- "AIRFA and Section 106: Pragmatic Relationships." In *Preservation on the Reservation*, A. Klesert and A. Downer, eds., Navajo Nation Publications in Anthropology 26, Window Rock 1991.
- "Prehistory and Beyond: The Place of Archeology" In *The American Mosaic: Preserving a Nation's Heritage*. R.E. Stipe and A.J. Lee, eds., US/ICOMOS, Washington DC, 1987.
- "Intercultural Mediation at Truk International Airport." With P.L. Parker. In *Anthropological Praxis: Translating Knowledge Into Action*. R.W. Wulff and S.J. Fiske, eds., Washington Association of Professional Anthropologists, Westview Press, Boulder 1987.
- "The Once and Future Drought." *American Archeology* 5:3:224-8, Ridgefield, CT 1985
- "Professional Responsibility in Public Archeology." *Annual Review of Anthropology* 12, Palo Alto 1983.
- "Recent and Current Archeological Research on Moen Island, Truk." With P.L. Parker. *Asian Perspectives* xxiv(1):11-26, Honolulu 1981.
- "The NART: A Plan to Direct Archeology Toward More Relevant Goals in Modern Life." *Early Man*, Evanston, winter 1981.
- "Don't That Beat the Band? Nonegalitarian Political Organization in Prehistoric Central California." In *Social Archeology*, C. Redman, Editor, Academic press, New York 1978.
- "The Evolution of Complex Political Organization on San Francisco Bay". In *Antap: California Indian Political and Economic Organization*. L.J. Bean and T.F. King, eds., Ballena Press, Ramona, CA 1974.

*Government Guidelines and Regulations*

- Regulations, guidelines, and plain-language brochures on environmental and cultural resource management, NEPA review, Section 106, and related topics, for Department of Agriculture Farm Service Agency (FSA) (unattributed, with FSA NEPA and Cultural Resource staff). FSA, 2004.

### *Government Guidelines and Regulations (Continued)*

- Orders, Guidelines, and Fact Sheets: Cultural Resource Management, Floodplain Impact Management, Wetlands Impact Management, Federal Real Property Disposal, Archeological Collections Management, Indian Sacred Sites Management, Historic Document and Artifact Management, Environmental Justice, and Social Impact Assessment (unattributed, with GSA NEPA Call-In Staff). General Services Administration, Washington DC, 1998.
- *NEPA Desk Guide* and related orders (unattributed, with L.E. Wildesen and GSA Environmental Quality Working Group). General Services Administration, Public Buildings Service, Washington DC, 1997.
- *Guidelines for Evaluating and Documenting Traditional Cultural Properties*. With P.L. Parker. National Register Bulletin 38, National Register of Historic Places; National Park Service, Washington DC, 1990
- *Preparing Agreement Documents*. Advisory Council on Historic Preservation, Washington DC, 1989.
- *Public Participation in Section 106 Review: a Guide for Agency Officials*. Advisory Council on Historic Preservation, Washington DC 1989.
- *Identification of Historic Properties: a Decisionmaking Guide for Managers*. Advisory Council on Historic Preservation and National Park Service, Washington DC 1988.
- *The Section 110 Guidelines: Guidelines for Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act*. With S.M. Sheffield. 53 FR 4727-46, National Park Service, Washington DC 1988
- *Regulations for the Consideration and Use of Historic and Cultural Properties* (Unattributed). Commonwealth of the Northern Mariana Islands Historic Preservation Office, 1983
- *Treatment of Archeological Properties: a Handbook*. Advisory Council on Historic Preservation, 1980.

### *Popular*

- "Archeology and the Fate of Amelia Earhart." *About.com*, June 2005. [http://archaeology.about.com/od/pacificislands/a/king\\_ae.htm](http://archaeology.about.com/od/pacificislands/a/king_ae.htm)
- "Amelia Earhart: Archeology Joins the Search." *Discovering Archeology* 1:1:40-47, El Paso; January-February 1999
- "Sea Changes: 14th Century Micronesia." *Glimpses of Micronesia and the Western Pacific* 25:1, Honolulu 1985.
- "Tonaachaw: a Truk Village Rediscovered its Past." With P. Parker. *Glimpses of Micronesia and the Western Pacific* 21:4, Honolulu 1982.
- "How You Can Help the Archeologists." *Boys Life*, Boy Scouts of America, 1971.

### *Other*

- Videotapes on "historic contexts" and "traditional cultural properties," for National Park Service
- "E-Book" environmental review software, for General Services Administration
- "NEPA for Historic Preservationists and Cultural Resource Managers," worldwide web pages for National Preservation Institute.