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MINERAL POLICY CENTER

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14 January 1997

Ms. Shirley Ann Jackson, Chair
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Joseph J. Holonich, Chief
High-Level Waste and Uranium Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material, Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Proposed In Situ Leach Uranium Mine in Crownpoint, New Mexico and Local Concerns

Dear Ms. Jackson and Mr. Holonich,

I am writing to express our organization's full support for a request made to you by Eastern Navajo Dine Against Uranium Mining (ENDAUM) and Southwest Research and Information Center (SRIC). These two groups requested that the Nuclear Regulatory Commission (NRC) issue a Supplemental Draft Environmental Impact Statement for the proposed mining project and that a public repository for all documents related to the project be established in Crownpoint. Mineral Policy Center fully supports both of these requests and urges the NRC to comply.

Mineral Policy Center is a non-profit environmental organization which works to reduce the negative impacts of hardrock mining. Our Southwest Circuit Office, in Durango, Colorado, directly assists communities in the Four Corners states who are facing specific proposed, existing and abandoned mine problems. I consider myself fortunate to have had the opportunity to have worked with both ENDAUM and SRIC over the last two years on the proposed uranium mining in the Crownpoint area.

As you are aware, Hydro Resources Inc.'s proposal to mine uranium using the "in situ leach" (ISL) technology would have significant impacts to water quality, water quantity, human health, quality of life, socioeconomics, and cultural resources. Mineral Policy Center has seen no compelling data to substantiate the claim that ISL uranium projects can return groundwater to baseline conditions. In Crownpoint, this likelihood is especially alarming due to the proximity of the proposed project to drinking water wells and due to the dependence of thousands of people throughout the Eastern Agency of the Navajo Nation on these wells for domestic and livestock uses.

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ENDAUM, a locally based group in Crownpoint, was founded for the purpose of informing its members and the larger community of the impacts of the proposed uranium mines. This is no simple task as the information is extensive, the process highly technical, the impacts serious and potentially permanent, the technology never tested on a commercial scale in New Mexico and the impacted communities are Dine, and therefore many speak traditional languages rather than English. Without any type of financial or professional compensation, ENDAUM members took on this daunting task of analyzing, understanding, and interpreting the proposed project. While their efforts have been excellent, their effectiveness has been hampered by the lack of a public repository for information relating to the project.

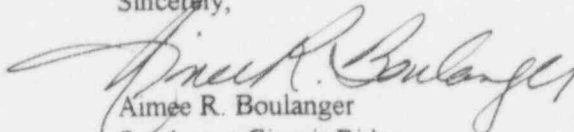
It is absolutely incumbent upon NRC to offer all related public documents in a public location, which provides easy access for Crownpoint and Church Rock residents, with convenient hours for this access, and with photocopying capacity. This should be done immediately, as it should have existed long before now. The Crownpoint office of Hydro Resources Inc. does not constitute an adequate "public" resource for this information. Environmental justice concerns, which are rife throughout this proposed project, compel a public agency to provide true, full, safe and comfortable access to all relevant information to those who will be most impacted by this project.

Mineral Policy Center also supports ENDAUM and SRIC requests for a Supplemental Draft Environmental Impact Statement. Many who commented upon the original draft, including the Environmental Protection Agency, found the project to have objectionable impacts and the draft inadequate in dealing with these impacts. As ENDAUM and SRIC's letter to you (dated December 6, 1996) illustrates, significant new relevant information has been gathered by NRC and submitted by the project proponent. The public has not had any opportunity to review or comment on this material. Issuing a Final EIS would clearly be in violation of the National Environmental Policy Act.

Also, I understand that the requirements of the National Historic Preservation Act have not been fulfilled. In particular, the identification and proper protection of traditional cultural properties remains to be accomplished. This reflects the insufficiency of the process thus far. Comprehensive gathering of cultural information, full understanding its significance, and meaningful consultation with tribes is imperative. The NRC must rectify this offensive insufficiency as soon as possible.

Mineral Policy Center appreciates this opportunity to be heard in support of the concerns and requests of Eastern Navajo Dine Against Uranium Mining and Southwest Research and Information Center. Thank you for your consideration of these important issues. We will look forward to your response.

Sincerely,



Aimee R. Boulanger
Southwest Circuit Rider

cc: Mitchell Capitan, ENDAUM
Chris Shuey, SRIC
New Mexico Environmental Law Center
Environmental Protection Agency