

Wyoming Association of Professional Archaeologists

Dear Mr. Wendtland,

Thank you for providing a response to the Wyoming Association of Professional Archaeologists' (WAPA) letter dated March 13, 2017. Based on your response, WAPA has additional comments.

The Wyoming Department of Environmental Quality (DEQ), Land Quality Division (LQD) stated the following:

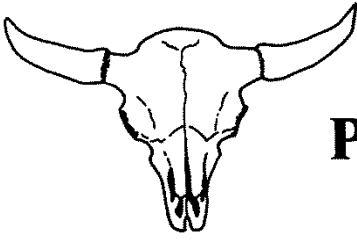
"The NRC and DEQ are in agreement that the DEQ's Uranium Recovery Program and the State of Wyoming are not subject to the requirements of Section 106 of the NHPA."

This is due to the NRC's discontinuance of federal authority over the radioactive materials and activities specified in Section 274b. of the Atomic Energy Act.

WAPA would like to ask that the Wyoming DEQ-LQD consider consultation with the Wyoming State Historic Preservation Office (SHPO) as part of the permitting process on all projects as the DEQ assumes regulatory responsibilities under the Proposed Rules.

Historically the uranium permitting process has included consideration for cultural resources. As areas where uranium is mined often have potential for sensitive cultural resources, WAPA requests that DEQ continue the tradition of cultural sensitivity in the uranium permitting process.

Thank you for your attention to our concerns.



WYOMING ASSOCIATION of PROFESSIONAL ARCHAEOLOGISTS

July 18, 2017

Mr. Kyle Wendtland, Administrator
Wyoming Department of Environmental Quality
Land Quality Division
200 W. 17th Street, Suite 10
Cheyenne, WY 82002

Re: Uranium Recovery Program Proposed Rules—Additional Comment Period

Dear Mr. Wendtland,

Thank you for providing a response to the Wyoming Association of Professional Archaeologists' (WAPA) letter dated March 13, 2017. Based on your response, WAPA has additional comments.

The Wyoming Department of Environmental Quality (DEQ), Land Quality Division (LQD) stated the following:

“The NRC and DEQ are in agreement that the DEQ’s Uranium Recovery Program and the State of Wyoming are not subject to the requirements of Section 106 of the NHPA.”

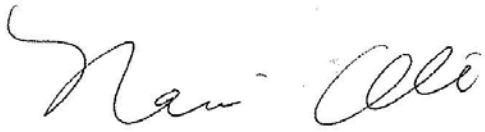
This is due to the NRC’s discontinuance of federal authority over the radioactive materials and activities specified in Section 274b. of the Atomic Energy Act.

WAPA would like to ask that the Wyoming DEQ-LQD consider consultation with the Wyoming State Historic Preservation Office (SHPO) as part of the permitting process on all projects as the DEQ assumes regulatory responsibilities under the Proposed Rules.

Historically the uranium permitting process has included consideration for cultural resources. As areas where uranium is mined often have potential for sensitive cultural resources, WAPA requests that DEQ continue the tradition of cultural sensitivity in the uranium permitting process.

Thank you for your attention to our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Naomi Ollie". The signature is written in black ink on a white background.

Naomi Ollie, President
Wyoming Association of Professional Archaeologists

Cc: Milford Wayne Donaldson, Chairman (or John M. Fowler, Executive Director), ACHP
Eric Hein, Executive Director, National Council of State Historic Preservation Officers
Mary Hopkins, Wyoming State Historic Preservation Officer
D. Bambi Kraus, President, National Association of Tribal Historic Preservation Officers
Stephen G. Burns, Chairman, U.S. Nuclear Regulatory Commission
Diane Gifford-Gonzalez, President, Society of American Archaeology
Susan Chandler, Incoming President, Society of American Archaeology
Julia Stubble, President, Alliance for Historic Wyoming