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## **CITY OF NORTH LAS VEGAS**

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RECEIVED

January 26, 2000

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Wendy R. Dixon  
EIS Project Manager  
Yucca Mountain Site Characterization Office  
Office of Civilian Radioactive Waste Management  
US Department of Energy  
PO Box 30307, M/S 010  
North Las Vegas, NV 89036-0307

**EIS001157**

**RE: Draft EIS for a Geologic Repository of the Disposal of Spent Nuclear Fuel and High-Level Radioactive Water at Yucca Mountain**

Dear Ms. Dixon:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement (DEIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada*. Following are the City of North Las Vegas comments.

1. The DEIS addresses actions that the Department of Energy (DOE) proposes to take to develop a geologic repository at Yucca Mountain and to transport the material from 77 sites around the country to Yucca Mountain. The material to be stored at the proposed Yucca Mountain geologic repository will have to be shipped there. It is our belief that the transport of these materials cannot be separated from the site itself. Therefore, the DEIS should include the proposed routing.
2. The DEIS statement that the actual route would have to be addressed in a separate environmental impact statement (EIS) is not acceptable. Delaying such an important part of the environmental analysis is not reasonable, especially given the legislative exemptions to the National Environmental Policy Act (NEPA) that have already been accorded to the Yucca Mountain project.
2. Because Yucca Mountain is about 90 miles north of Las Vegas, the greatest impact to North Las Vegas will be the material transport phase. Specific impacts to North Las Vegas were not sufficiently addressed in the DEIS.

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- 3     4. The City of North Las Vegas has been working with the Bureau of Land Management for some time to make it possible to develop 7500 acres just north of the Beltway alignment as a master-planned community. The DEIS mentions these 7500 acres, but does not address the impacts of transporting the radioactive material, whether by rail or highway, through this area. Of particular concern are the impacts on property values in the area. These 7500 acres are the future of North Las Vegas and any diminution of their value will have long-term impacts not addressed by the DEIS.
- 4     5. The assumptions used throughout the DEIS were inconsistent. On the one hand, 1990 census figures were used to determine risk and routing. On the other hand, the DEIS assumes a transportation system in place that does not yet exist. The analysis should use a consistent basis to make impact evaluation possible.
- 5     6. North Las Vegas' population has more than doubled since 1990, and it continues to grow at more than 10% per year. A brand-new school is planned for construction within one-half mile of the transport route proposed through North Las Vegas. The radiation risk analysis needs to be reexamined based on more accurate population figures and probable development.
- 6     7. The DEIS assumes that the Northern Beltway between I-15 and US-95 would meet Interstate freeway standards and would, therefore, be available for use by both heavy-haul and legal-weight trucks. The Beltway will not meet freeway standards until well after nuclear waste shipments have started. The initial "Beltway", to be constructed by 2002, will be a two to four-lane, surface arterial with at-grade intersections; the beltway is unlikely to meet freeway standards before 2023. If the Beltway is to be used for the transport route, then the accelerated construction to a freeway standard should be a required mitigation measure. The DEIS should acknowledge that the Beltway will not meet freeway standards and therefore include accelerated construction in the project cost.
- 7     8. Air quality in the Las Vegas Valley is in the "serious" non-attainment category for carbon monoxide and PM10 particulates. Any induced traffic congestion, such as that created by slow-moving vehicles on a heavy-haul route through the valley, and its associated air quality impacts must be quantified and addressed. Using 10,815 as the number of shipments (Appendix J), there would be about 2 heavy-haul trucks using the roadways every day for 24 years. The DEIS did not propose any mitigation measures to alleviate the deterioration in air quality caused by oversized, heavy-haul vehicles creating congestion.
- 8     9. The transportation assumptions must be reevaluated to reflect the transportation system development that is most likely to be in place during the transportation phase. This analysis should account for the effects of major construction activities on the shipments.
- 9     10. A heavy-haul route through North Las Vegas and the Las Vegas Valley is not recommended. The costs of using such routes in terms of congestion and decreased air quality were not adequately addressed in the study.

- 10      11. The construction of a rail connection through the northern Las Vegas Valley is also of concern. The DEIS assumes that such a connection would have at-grade crossings, which is not advisable in such a rapidly urbanizing area as the Las Vegas Valley. Already, the Craig Road crossing at the UPRR experiences serious traffic backups and delays. It is not in the interest of the traveling public to create similar problems in the future.
- 11      12. If a rail line is built through the north end of the Las Vegas Valley, grade-separated crossings should be included as part of the project. The air quality and traffic congestion consequences of delaying vehicular traffic through the Las Vegas Valley are understated and mitigation measures need to be identified.
- 12      13. The DEIS notes that the repository is to be designed for 70,000 metric tons of heavy metal (MTHM) but that more than 100,000 MTHM will need disposal. This DEIS implies that the additional waste could be accommodated easily at a second repository at Yucca Mountain. This DEIS should state explicitly that another DEIS would be required in the event that a repository at Yucca Mountain is approved and then proposed for expansion.
- 13      14. The DEIS is not clear as to what census blocks with high minority populations or high levels of poverty would be affected by the proposed routings. The DEIS refers to "City of Las Vegas" and "Las Vegas area" interchangeably. The area of concern needs to be clarified to make the environmental justice findings understandable.
- 14      15. During the public hearing on January 4, 2000, one person testified that because the casks used in transporting the material would have to meet stringent standards there would be no safety risk during transport. While we do not doubt that the cask design could indeed meet strict standards, there is no guarantee that the standards will be met during the manufacturing process. This was the situation when a leaking white metal box was discovered while transporting low-level waste to the Nevada Test Site. The cost of transporting the material to Yucca Mountain must include oversight during the construction of each of the shipping casks and canisters.
- 15      16. The models used to select highway routing and determine risk (HIGHWAY, RADTRAN4) used the 1990 census data. At the same time, the models assumed that certain transportation facilities would be available for use in the future. To be credible, the analysis should be based on the population and facilities likely to be in place at the time the material is shipped. These analyses are deficient and need to be redone.
- 16      17. The vehicle emission analysis for the Las Vegas Valley was insufficient in two ways. First, it was based only on legal-weight trucks and did not consider the heavy-haul option which will create traffic congestion. Second, the reasoning for assuming only a limited impact was based on I-15 traffic volumes at Sahara Avenue, which is in the center of the City. None of the proposed routes go through this area, so a comparison using a more likely location (such as the permanent traffic recorder near the Apex interchange) should be used.

Wendy Dixon  
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Again, thank you for the opportunity to comment on this important document. If you have any questions, please feel free to call Charity Fechter (702) 633-1235 or me (702) 633-1002.

Sincerely,



Patrick P. Importuna  
City Manager

PPI/CF

cc: Dennis Bechtel, Clark County NWRP  
Joe Strolin, Nevada Nuclear Projects Office  
Charity Fechter, Public Works

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