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1 MS. FELDMAN: My name is Jane Feldman. I am speaking for the Southern Nevada group of the Sierra Club. I'm co-chair of the conservation committee. The local group of the Sierra Club opposes the proposed Yucca Mountain Project. Our reasons for this fall into five areas of concern: Site safety, alternatives considered, risk assessment, transportation issues and issues with environmental justice and public participation.

2 Site safety: The Department of Energy has in its possession data and evidence of two disqualifying conditions both in reference to hydrologic considerations on unsuitability of the Yucca Mountain site. The DOE has not proven that the site is safe as a long-term geologic repository for the disposal of nuclear and radioactive waste. Therefore, Yucca Mountain should be disqualified for consideration as a disposal site.

3 There has been no field testing of the system for retrieving the rods should that become. How can we place confidence in a project that claims retrieval of the rods would take a minimum of twenty-five years? If for some reason the computer generated models of Yucca Mountain safety were wrong and the rods had to be retrieved, what would happen in those intervening years? Would the Federal Government relocate all of affect residents to a safe area, by their properties, assure economic availability despite relocation?

4 Alternatives: The no action alternatives are unreasonable alternatives. Neither scenario one nor scenario two are feasible, thus making the proposed action seem like the best and only course of action. DOE has failed to provide reasonable no action alternatives despite being advised by their own attorneys that this should be done. Why did you not consider an alternative to encapsulate or otherwise stabilize the waste on-site where it is generated, thus driving to zero the risk to citizens and the natural environment along transportation routes? Why is scenario two the only course of action that would lead to environmental justice impacts? The DOE has been disingenuous in creating two no action alternatives that are not logically, scientifically or morally sound.

5 How are we to believe that the calculated risk due to earthquake and seismic activity is insignificant when in October 1999, an earthquake awakened all of us in our beds? How can we be confident that the DOE knows what types of seismic activity may occur in the next 10,000 years? Even though you are not required to do so by law, you should have considered alternate geologic disposal sites and you should have considered alternate technologies for geologic disposal. If science was funded to do research to develop nuclear energy, why can't funds be allocated to develop technology for disposal?

7 Calculated and perceived risk: The DEIS finds that all the calculated risks are statistically insignificant and thus do not require mitigation or compensation. This raises questions about the scientific validity of the Yucca Mountain project. How can there be no major impact to people or the environment when a project of this scope or magnitude has never been attempted before? The calculated risk due to seismic activity considers activity at Yucca Mountain. It does not consider risk to cargo en route to Yucca Mountain. The entire issue of calculated risk is a major concern. There is no mention of the degree of uncertainty associated with any of the risk assessments. With no data to the contrary, we can only assume that the degrees of uncertainty are high.

9 Furthermore, population data are based on 1990 figure. You estimate, for example, that 80,000 people will live around Las Vegas' northern beltway. The County estimates that 380,000 people will live around the beltway in the year 2010. The calculated risk and exposure will be gravely larger with an accurate estimate of Las Vegas Valley's population. Calculated risk assessments must use better data, more variables and provide better estimates. Why are the only calculated health risks latent cancer fatalities?

...10 [There is no assessment of ill health or radioactive sicknesses which could occur from releases into the air, water or soil. An obvious omission is the risk of injury and death caused by increased traffic accidents, both within Southern Nevada and along the entire length of the transportation routes. Risk assessments must include all risk factors and must consider all known and probable impacts to quality of life, the health of citizens and the natural environment and the environment viability of the region.]

11 [Why is perceived risk not included in the analysis? Human behavior is not governed by science and rationality. There is a large factor of perceived risk that does and will have a real and significant impact on the economic viability of the region. Why has DOE failed to provide analysis of perceived risks and the consequent stigma surrounding the quality of life for human ecosystems and the region's economy?]

12 Transportation issues: [Why has DOE failed to address impact associated with the type of transportation vehicle and failed to provide assurances that taxpayers will not be burdened with increases to repair damaged by the project? Why is there no mention of the increased cost to Clark County or to any other location along the transportation route should there be an accident with radioactivity released into the environment?]

13 [Radiation release causes health risk and contaminates the highway surface and the surrounding area. Using your own DOE accident and incident data, Clark County estimates that forty such incidents of surface contamination will occur within Clark County for the proposed action of this DEIS and that three incidents of radioactive contamination beyond the vehicle will occur. These figures are only within Clark County. The response to all such accidents and incidents must be addressed by the DEIS.

14 Health insurance policies routinely exclude nuclear and radioactive accidents from policy coverage. Will the taxpayer be levied an additional burden for increased indigent medical funds? [What information is being provided to planning authorities to support and train emergency response and medical personnel when waste transportation begins?

15 There is no mention in the DEIS nor is there any data given for emergency action plans to be developed at Yucca Mountain within the metro area of Las Vegas nor any other metro area that the transportation routes go through, nor anywhere along those routes. An accident not only can but will occur at sometime, somewhere. Every inch of the way needs information to develop their own emergency action plans. There's no mention of compensation or mitigation because of an increase in government services required because of the activity along the transportation routes or at Yucca Mountain. There will be an increased need for development inspectors and several different organizations, increased law enforcement, et cetera.]

17 Environmental justice and public participation: [Why have the environmental justice impacts along the transportation corridors been ignored? We find it incredible that a project that affects so many communities along so many major transportation routes result in absolutely no impact? [Why are the people who live along the routes being denied an opportunity to participate in the EIS process in a meaningful way? Why does DOE not take a proactive role in inviting all affected parties to participate in decision-making? [Why have not segments? They have been categorically denied participating in the EIS.]

18 The DEIS has not been translated into Spanish, as Hawaii a Las Vegas has a large Hispanic population? Have provisions been made for translators to be at all the hearings so that citizens with primary languages other than English have an equal opportunity to participate in the decision-making? Have copies of the executive summary been made available in Braille so that blind citizens have an opportunity to participate?]

20 [Why have there been such a limited involvement with the Native American population? All the nations and peoples who live along the transportation routes must be involved in complete and thorough negotiations with our government and the development of the DEIS.]

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In summary, we find the DEIS woefully lacking. It fails to provide citizens with the necessary assurances that the Yucca Mountain Project has merited further action, other than political expediency. For all these reasons, the Sierra Club demands and requests a Supplemental EIS be issued which addresses the issues raised herein.