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MR. SCOTT: Good afternoon. My name is Randy Scott, a planning manager with San Bernardino County. I provide technical support to Supervisor Mikels and Mr. Goss. I would like to provide just a summary highlight of our technical detail comments that we will follow up with in writing to DOE.

1 And I would like to express my appreciation for the quick response for materials, once the county learned of the document availability, the staff has been very responsive in providing that material in a short-time fashion.

2 Based on our review today, the county is very disappointed in the cursory treatment of the transportation impact associated with the project, specifically those applicable to areas outside the State of Nevada. We feel very strongly that any informed decision with regards to establishing a long-term, high-level radioactive disposal site must include a detailed analysis of specific routing of radioactive waste transporters. Such an analysis must include a consideration of vehicle accidents and/or deliberate sabotage and the potential for resultant release of radioactive material, considering the factors relevant to the regional conditions that may affect the safety of radioactive waste transportation.

3 The county finds the EIS to be fundamentally flawed and inadequate due to the failure to provide detailed examination of potential impacts to local communities, from unique factors associated with the transportation of spent nuclear fuel and high-level radioactive waste in Southern California. The document fails to recognize transportation characteristics in this region, and those that may affect the safe transport of this very dangerous waste. Physical environmental elements, such as earthquakes, wild fires, varying climatic conditions, i.e. snow and ice in the mountains during winter, in very strong winds in the mountain passes and desert during fall and winter conditions, and extremely high ambient temperatures in the summer, as well as the notorious levels of traffic congestion in the Los Angeles basin, add to the degree of risk the ground transportation that appears to be ignored in the assessment.

I'll provide just a quick highlight of some key observations by section that I will reference.

4 Section 2.1 proposed action; the county believes the description of the proposed action is incomplete due to minimal analysis of transportation impacts that may result from implementation of the project. The EIS is substantially deficient providing a complete and accurate description of the regional and local transportation routes and associated regional and local environment settings.

5 Section 2.1.1.3, National Transportation Scenario; the general approach to evaluating the transportation of radioactive waste to Yucca Mountain, which is reflected in the label of this section, is wholly inadequate. The strategy is a breach of good faith disclosure of the true impact associated with implementing a project of this magnitude.

6 Section 2.1.3.2, National Transportation; neither Appendix J nor the text of the EIS identifies specific routes in spite of the fact that this information must have been used to develop the travel distances displayed in the Table 11 of Appendix J. And I think this was borne out by Ms. Dixon's acknowledgement that the precise routing map was not included in the document as she indicated earlier.

The routing process was conducted through the use of a computer model as indicated in the document with none of the variables and assumptions displayed that are built into the model. No public disclosure of this information was provided, so independent verification is impossible to perform.

7 continued on page 2 Section 2.1.3.2.2; it's an extensive labeling system, mostly legal-weight truck shipping scenario. According to calculations that staff has made based on information in the document, we calculated that approximately 12 and a half percent of all spent -- expected deliveries of waste on a nationwide basis to

7 continued Yucca Mountain will be shipped through San Bernardino County during the 24-year operation period of the facility. This proportion of radioactive waste transport within our county is a very serious concern.

FACILITATOR HOLMES: You are at the four-minute mark.

8 MR. SCOTT: Thank you. The analysis in Appendix J appears to contain factual errors or misrepresentations.

For example, it can be calculated from Table J-5 that 1667 truck shipments from all four California commercial sites would take place during the 24-year operational period; however, when referring to Figure J-10 in the document, a small notation indicates that 6250 truck shipments will enter Nevada on I-15 from California. There's an obvious discrepancy in the numbers, amounting to 4583 truck shipments. This is of concern where these occur.

9 Based on the comparative analysis, on a national scale it appears that rail shipment of nuclear waste is superior to that of truck shipment. Accident rates are lower and risk of radiological contamination to both human and ecological receptors is lower for rail shipment. While not highlighted in the text of the EIS, the observations displayed in Section J.2.2 support the use of dedicated trains over general freight service for enhanced operational and safety advantages in the rail mode.

The county supports further detailed examination of dedicated rail shipments should the project proceed to the next level of analysis. Thank you very much for your opportunity to speak.

FACILITATOR HOLMES: Again, if you have written copies of your statement, if you can turn them in to the court reporter.

MR. SCOTT: They will be provided in written form.

FACILITATOR HOLMES: Thank very much. Peter Brierty, to be followed by Jay Lindberg.