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September 5, 2001

Ms. Carol Hanlon
United States Department of Energy
Yucca Mountain Site Characterization Office
M/S #025
P.O. Box 30307
North Las Vegas, NV 89036-0307

Re: Proposed High-Level Nuclear Waste Repository at Yucca Mountain, Nevada
Preliminary Site Suitability Evaluation

Dear Ms. Hanlon:

Following is a formal statement of the Board of Clark County Commissioners' official position with respect to the proposed repository at Yucca Mountain, and specifically, the timing and adequacy of the Preliminary Site Suitability Evaluation (PSSE).

Request for an Extension of Time to Review the PSSE:

Prior to discussing our comments on the PSSE, it should be noted that Clark County joins the State of Nevada in requesting a minimum sixty day extension of time for the public comment period, currently scheduled to close on September 20, 2001. An extension of time will allow the Clark County Board of Commissioners more time to consider the issues presented in the PSSE, and to take formal action at a regularly scheduled Board meeting.

Objections:

The PSSE is premature and incomplete. It does not provide an adequate basis for consideration of the site recommendation by the Secretary of Energy, the President of the United States, or Congress. Further, absent the existence of a Final Environmental Impact Statement and final siting guidelines, it is inappropriate for these public hearings to go forward at this time.

Too many unanswered questions remain. Heavy reliance on engineered barriers and the absence of adequately tested, full-scale waste packages creates an unacceptable level of uncertainty where there is the greatest level of performance expectation.

The PSSE fails to address a multitude of issues of concern to the public, elected officials, and others in Clark County. Given that the DEIS listed a number of potential transportation routing options in

Nevada, and in particular the Las Vegas Valley (e.g., the Beltway), it is unconscionable that these issues and related potential primary and secondary socioeconomic impacts have not yet been evaluated.

Clark County's comments to the DEIS were submitted to DOE on February 15, 2000, well over a year ago. Clark County, along with the City of Las Vegas, and the State of Nevada, submitted comments to the SDEIS just weeks ago. It is still uncertain, however, how (or whether) DOE has considered the issues raised in our reviews of these documents. The DOE's plan to merely categorize and append the thousands of comments received to the DEIS and SDEIS in response to our concerns is an unacceptable procedure under the requirements for the Final Environmental Impact Statement.

The DOE continues to disregard the notion that the Yucca Mountain Program is national in scope. The magnitude of this program creates the potential for impacts in much of the United States, largely with respect to the protection of public health and safety of over 50 million United States residents affected by the transportation of high-level nuclear waste through at least 43 states. The DOE continues to discount the views expressed by a large number of concerned citizens throughout the nation who participated in last year's DEIS public meetings. By its own actions it conveys the message that these issues are not important.

Since the PSSE does not describe a specific design for the repository, the information provides nothing to increase the public's knowledge of potential environmental impacts. Also uncertain is how DOE can provide a "site recommendation" when "flexible" repository concepts are still in the planning and design phases. Absent a specific design, it is also unclear how the site can be evaluated against a specific Environmental Protection Agency exposure standard siting guidelines.

Finally, we urge the DOE and the Secretary of Energy to include stakeholders throughout the United States, and allow them to have an opportunity to express their views on the PSSE at public hearings. Hearings held in other parts of the nation will enable others to consider the PSSE, important since its treatment or non-treatment of issues will affect them as well. Furthermore, since there are ten affected units of local government in Nevada and California, DOE should hold also hearings in other areas of Nevada, or in Inyo County in California.

Please consider these concerns in addition to the comments we have previously submitted for the DEIS and SDEIS, and include this letter as part of the formal record created as a part of this public hearing process.

Sincerely,

Dario Herrera
Chairman, Clark County Commission

Myrna Williams
Vice-Chair, Clark County Commission