

040748



webserver@yucca-web1.ymp.gov on 06/02/2004 08:53:43 AM

RECEIVED

To: EIS.Comments@notes.ymp.gov
cc:
Subject: EIS Comment

JUN 02 2004

User Filed as: Not Categorized in ERMS

June 02, 2004 08:53:43

IP address: [REDACTED]

The Commentors Name:
----> Leslie A Perrigo

The Commentors Address:
----> [REDACTED]
----> [REDACTED]

Email Information:
----> [REDACTED]
----> Add commentor to the mailing list : no

Contact Information:
----> fax number :
----> phone number :
----> organization : IECAN
----> position : Executive Director

Comment Text :
-->Attention Robin Sweeney:

EIS Document Manager

DOE's decision to use "mostly rail" shipments to haul 77,000 tons of highly radioactive wastes to its proposed national dumpsite at Yucca Mountain, Nevada, and to build a rail line from Caliente, NV to provide direct rail access for waste shipments to Yucca Mountain, has vast implications for where, and how much, high-level radioactive waste would travel across the U.S. These decisions will potentially impact the entire national high-level radioactive waste transportation system, meaning larger numbers of shipments on certain railways in certain states and cities and less in others. DOE has not adequately assessed or analyzed the national impacts of its decisions. The scoping process must encompass these vast implications and impacted localities! Also, the abbreviated scoping period, which includes Memorial Day weekend, is not sufficient for most Americans to comment on. The DOE should allow for 180 days of public comment.

In addition, public scoping hearings should be held for gathering public comments in the states and cities across the country that would be most impacted by its decisions. All comments received should be transcribed and

posted immediately to the DOE's website to enhance public participation and interaction. Hearings should be conducted so that speakers go one at a time, so that all present can hear what is being said. If this means that longer hearings or multiple days of hearings must be held in the same city to accommodate meaningful public involvement, then so be it. This is far too important of a decision to rush. How can DOE select a specific rail spur route within Nevada when it has never completed an adequate nationwide transport analysis? Not only is this illogical, it also violates the legal requirements of the National Environmental Policy Act.

DOE's manipulation of the facts for political purposes

Although Energy Secretary Abraham said that as few as 175 train casks annually would be needed to haul waste from reactors across the U.S. to the proposed dump, in DOE's "mostly rail" scenario in its Final Environmental Impact Statement (FEIS) for Yucca Mountain (Feb. 2002), DOE projects that it would require from 10,725 train shipments over 24 years to 22,057 train shipments over 38 years. That's 447 to 580 shipments per year under the "mostly rail scenario," not 175 as Secretary Abraham told Congress. What about the 2,500 barge (on the Great Lakes, rivers, and seacoasts) and/or heavy-haul truck shipments that would be required to get waste from certain reactors sites lacking rail access to the nearest railway?

Dangers and destructive impacts along the targeted corridor of land between Caliente and Yucca Mountain, Nevada

It is truly frightening that this proposed rail line hugs the border of the Nellis Air Force bombing range for hundreds of miles. An accidental or intentional aircraft crash or bombing of a high-level radioactive waste train could release catastrophic amounts of radioactivity impacting large areas downwind and downstream.

It is similarly frightening that this railway would pass so closely by mining operations, raising the specter of accidental or intentional explosions of high-explosives used in mining.

It is very troubling that much of the land has never been evaluated or inventoried for threatened and endangered species of wildlife. A comprehensive assessment of animals and plants in the targeted rail corridor must be done during DOE's environmental impact statement process. DOE should pay for such work to be done by an independent organization that can be trusted to not allow political or economic pressures to bias its wildlife survey.

It is unacceptable that DOE would trample Native American rights by constructing this railway. The entire Caliente-to-Yucca Mountain railway would lie on lands belonging to the Western Shoshone Indian Nation under the Treaty of Ruby Valley, which the U.S. government signed and ratified in 1863. Such treaties with sovereign Native American tribes are the highest law of the land, equal in stature to the U.S. Constitution itself, and DOE should not violate the Treaty of Ruby Valley by building this proposed railway, or by building the Yucca Mountain dump. DOE's proposed rail line and dump immorally

and illegally threaten cultural resources, archaeological sites, artifacts, sacred sites and holy lands of the Western Shoshone and other Native American tribes.

It is dangerous to public and worker health that DOE's proposed rail line is likely blanketed with radioactivity from nuclear weapons testing fallout from the Nevada Test Site. Given that large scale railway construction would disturb massive amounts of contaminated soil and release radioactive dust into the air, DOE must do a complete inventory of the radioactive contamination of the proposed land corridor. After all, it was the Atomic Energy Commission and DOE itself that conducted those nuclear weapons tests and caused that radioactive contamination in the first place.

Please take these issues into consideration when making the final decision. I hope you will do the right thing and think about the people- the many hundreds of thousands of Americans, that are DIRECTLY affected by this.

Sincerely,

Leslie Perrigo
