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SEP 30 1999

Comment on Yucca Mountain Draft EIS

EIS000056

1... Good evening, my name is Tom Buqo and I am a consultant to the Nye County Nuclear Waste Repository Office. I have been tasked with preparing the Nye County Water Resources Plan. Part of my evaluations have focused on Pahrump Valley. I have projected that the community of Pahrump will experience water shortfalls and have identified water importation as one alternative for addressing the expected shortfall.

Water importation is not a new concept. Already the communities of Tonopah, Logandale, Overton, and Virginia City in Nevada and major cities like Tucson and Los Angeles are importing groundwater as a source of water. Because of the overwhelming presence of federally controlled lands in Nye County, water importation will at best be costly and at worst will be prohibitively expensive.

Nye County cannot obtain additional groundwater supplies from the east because Las Vegas is already overappropriated and over pumped.

To the south and southwest water cannot be imported from California because of the presence of the Mojave National Preserve and Death Valley National Park.

To the west and northwest, the presence of the endangered species at Devils Hole, Ash Meadows National Wildlife Refuge, and areas designated by the Bureau of Land Management as Areas of Critical Environmental Concern have resulted in prohibitions on water development.

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1 cont. To the north, groundwater cannot be developed because of the presence of 300 million curies of radioactive contamination under or near the water table at the underground nuclear testing areas on the Nevada Test Site. The proposed repository is predicted to leak additional radioactive contamination into the aquifers in the southwestern portion of the Nevada Test Site...water that is currently potable will be contaminated if the DOE's Performance Assessment is correct. This will result in a significant adverse impact on the water resources that must be mitigated.

2... In total, the United States has implemented a policy of permissible pollution upgradient of the communities of Amargosa Valley and Pahrump and absolute preservation of the groundwater quality and quantity in the areas downgradient of these communities. Nye County, in their water resource planning efforts is between the proverbial rock and a hard place. Yucca Mountain will perpetuate the policy of permissible pollution and will further reduce the quantity of water that is available to meet future water demands in the County.

Under 40 CFR 1508.18 (b)(3) NEPA mandates that the impacts of federal policies must be evaluated in an EIS. The Yucca Mountain EIS must be revised to address the impacts of these contrasting federal water resource policies.

In short, Nye County has faithfully served as the nation's sand box for almost half a century. Unfortunately, the Department of Energy and the Air Force have contaminated their portions of the sand box and the Department

2 cont. of Interior demands that their portions be left pristine. These policies, while probably unintentional, have had far reaching consequences for the County  
3 and greatly hamper water planning efforts. Should the repository at Yucca Mountain go forward, a guarantee of safe and adequate water supplies to the citizens of Nye County must be a lynchpin of any mitigation, compensation, or equity offsets. Thank you.

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