EIS001861

THE ROUSE COMPANY

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VIA FACSIMILE (1-800-967-0739)
AND U.S. MAIL

Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, M/S 010
North Las Vegas, NV 89036-0307

RE: Yucca Mountain Draft EIS
Comments of The Rouse Company and
The Howard Hughes Corporation

Dear Ms. Dixon:

Enclosed please find the Comments of The Rouse Company, and its affiliate, The Howard Hughes Corporation, to the Draft Environmental Impact Statement for a Geological Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (July 1999). Please add the undersigned to the Department of Energy's mailing list for receiving future information on this Environmental Impact Statement.

Sincerely yours,

Richard E. Galen

Richard E. Galen
Vice President and
Deputy General Counsel
410-992-6410
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Comments of The Rouse Company, and its affiliate,
The Howard Hughes Corporation to the
Draft Environmental Impact Statement for a
Geological Repository for the Disposal of
Spent Nuclear Fuel and High-Level Radioactive Waste at
Yucca Mountain, Nye County, Nevada (July 1999)

The Rouse Company and its affiliate, The Howard Hughes Corporation, believe that this Draft Environmental Impact Statement ("Draft EIS") is incomplete and inadequate in two specific areas relating to the transportation of nuclear materials to the proposed Yucca Mountain site.

1... First, the analysis of the impact of a number of the proposed nuclear haul transportation routes in the Draft EIS is completely inaccurate because of incorrect assumptions and out-of-date information about the current and future population and employment centers in the Las Vegas Valley.

2...See p. 3 Second, the Draft EIS fails to clearly define the process for transportation route selection.

Background

1 cont. The Howard Hughes Corporation, an affiliate of The Rouse Company, is developing the 22,500 acre master-planned community of Summerlin, which spans the western and northwestern rim of the Las Vegas Valley in Southern Nevada. More than 10,000 acres of Summerlin have been developed or are under development as residential communities, retail village centers, schools, recreational facilities, office buildings and other employment locations. More than 47,000 people currently reside in Summerlin, which has a projected population of 160,000 upon completion of the community by 2015. Future development plans include Summerlin Centre, with a regional shopping center, restaurants, entertainment facilities, offices, cultural, education and religious facilities, as well as continued residential development. The Las Vegas western perimeter beltway, which opens in 2000 in Summerlin, will have six interchanges in Summerlin and will pass through both residential and commercial components of the community. While we recognize that the future of the Yucca Mountain project is still very uncertain and the possibility of the transportation of nuclear waste through the Las Vegas valley at some distant point in the future is still only a remote possibility, The Rouse Company and The Howard Hughes Corporation, out of concern for the quality of

life of all residents of Summerlin as well as the interests of the Las Vegas community at large, provide the following details on these two areas of concern relating to the Draft EIS.

Fatal Flaw in Transportation Route Analyses

1 cont. A number of the potential nuclear waste transportation routes listed in Section S.3.1.3 of the Draft EIS (both legal-weight truck routes and intermodal heavy-haul truck routes) would make use of the Las Vegas perimeter beltway described above. The Draft EIS describes these routes as passing "near the Las Vegas metropolitan area", when in fact, the routes will pass directly through the very core of heavily populated areas that currently exist or are under planning and/or construction. Most revealing is the detail of the beltway routes shown on Figure S-12 in the Draft EIS which misleadingly indicates that the major secondary roads in the Las Vegas area do not extend beyond the perimeter of the beltway. To the contrary, many of these roads already extend beyond the beltway and support existing, under construction or planned development. The failure of the Draft EIS to consider these factors is further demonstrated by the lack of any discussion in Section 4.2.2. Nevada Transportation Impacts, of the impact of legal-weight trucks passing through the communities along the Las Vegas perimeter beltway.

Transportation Route Selection Process

2 cont. The Draft EIS includes no outline of the process that would determine which of the proposed haul routes is eventually chosen. Section S.4.2.2. Nevada Transportation Impacts, states that selection of a specific rail alignment, or of an intermodal route, would require additional field surveys, environmental and engineering analysis, state and local government consultation, and National Environmental Policy Act reviews. The implication is that a route utilizing legal-weight trucks would not require the same level of additional survey, analysis and review. There is also no indication of a plan to allow opportunity for public input in the selection process.

Conclusion

Intro for 1,2 For these reasons, we believe the Draft EIS is inadequate and fails to address critical concerns of the Las Vegas community.

Submitted: February 23, 2000