

RECEIVED

JAN 11 2000

EIS002119

RUSSELL DEBARTOLO

MR. DEBARTOLO: Thank you. Go ahead. I'm sorry.

My name is Russell DeBartolo. I'm on the staff at the Clark County Nuclear Waste Division and these are staff comments on general and transportation aspects of the DEIS that will be expanded upon regarding policy by -- this evening by Commissioner Myrna Williams of Clark County, and specific aspects will be referred to by the Nye County representative who will speak next.

1 I also want to mention that in written comments, we will rebut the use of information from past transportation campaigns and performances since those are based upon un -- unrelated briefer campaigns using different equipment, carrying different material and under dif -- and run under different institutional controls. However, if those -- if that information is used, we can also show that even minor incident may affect our community in serious ways not mentioned or considered in the EIS.

2 There are just a couple of things that I'd like to say. First of all, I'd like to remind everyone of the importance of the EIS and how this is to be used in Federal decisions regarding Congressional and presidential approval and NRC licensing. If Clark County and public comments are not fully addressed in the EIS process, they will not be considered in the decision process and thus far the Department of Energy has not addressed the number of issues of vital importance to Clark County.

In fact -- let's see where I put this. In fact, at the request of DOE last year, we provided as the Nye County and other affected units of local government an extensive reference document that contains information and citations that could have helped DOE provide a more adequate document. We have seen no evidence that -- that this material has been used, or that was even mentioned in the DEIS references. We hope that our comments and those taken at other hearings do not meet the same fate.

3 With regard to sufficiency and completeness of the DEIS, under NEPA regulations, an EIS must provide enough information with enough detail and meaning to allow for mitigation and planning by affected parties. At this point, because of insufficient information, lack of clarity regarding the decision model regarding impacts and incomplete analyses, we have no basis to make informed comments let alone plan and implement programs to protect the health and safety of our residents and visitors.

4 Specifically our -- these Clark County concerns that we'll talk about today have to do only with impacts due to transportation and not impacts due to operation of the -- a repository at Yucca Mountain. First, there's been no description of the transportation system to allow for adequate -- adequate impact assessment and review. This appears to follow an approach -- this appears to be an attempt by the Department of Energy to follow an approach by NRC to use a package and generic transportation analysis in the reactor relicensing process. This is an insufficient and shortsighted approach to consideration of a major aspect of the Yucca Mountain Project.

5 About half of the -- about half of the document is devoted to transportation, to impacts related to transportation. There is little consideration of the feasibility of transportation plans. For example, there was no -- there's no thought it seems of what effect heavy-haul operations would have through rugged terrain on insufficient infrastructure through congested urban areas on insufficiency analyzed routes in conflict with present planned land uses. We would imagine that even a minor incident would lead to -- to congestion not even seen during the worst of commute hours.

6 We also feel that there has been severe underestimation because of -- because of the severe underestimation of numbers of people that maybe affected because of use of '99 population numbers. We -- there is a low estimate of health -- of health risks and other risks to -- to the population. There is inadequate focus on the

...7 | concerns of minority, low income and Native American groups, including the more immediate economic affects and then the general population and full inclusion in the process. Such emphasis or such focus has been directed by presidential order and by DOE's own implementation guidelines for environmental justice.

8 | There are also inadequate descriptions of equipment groups to allow for full analysis of groups, delineation of governmental roles and responsibilities, costs to local governments for -- for services that would -- that would -- that would be necessary should certain routes be chosen, and I go back to the fiscal impact. Whether or not the impacts are noted and whether or not we are funded for such programs, we still must provide those under our governmental mandate.

9 | There is also inadequate analysis of cumulative effects because of planned or present shipments of low-level waste, through waste to and from the NTS and present movement of hazardous material. There may be severe economic impacts within that context. The only cumulative effects we see, although there was some -- there's some lip service provided, is cumulative effects based upon this campaign only. However, we are operating in a context of a number of shipments and of a number of different materials.

10 | And last, I'd like to -- to mention that should there be an incident, even if the routes do not go through Clark County, under certain governmental agreements, we do provide as a large county with a number of resources assistance to other counties, nearby counties in the event of hazardous materials or a nuclear -- nuclear materials or waste incidents. And lastly, I'd like to say that this community, Clark County and its urban areas especially and rural areas has been built up from the desert. We have developed. There have been the talents and skills and efforts of a number of people, many of whom have testified here. This has value. There's value in the quality of life. There's value economically. There's value for the future. And these have not been given -- given serious consideration in the DEIS.