

JAN 11 2000

MYRNA WILLIAMS

MS. WILLIAMS: Thank you, and I hope I can make my statement in five minutes.

My name is Myrna Williams and I'm a Commissioner in Clark County, Nevada. I'm also a member of the State of Nevada Commission on Nuclear Projects and was for many years a member and chair of the Nevada Legislature's High-Level Radioactive Waste Committee.

I am here tonight to offer comments to a document that greatly concerns me. The Draft Yucca Mountain Environmental Impact Statement is what I will focus on, my comments on major issues of concern to Clark County. The County will be submitting more comprehensive comments and documentation prior to the Department of Energy's new deadline.

For context, I'd first like to describe Clark County. In the '90s, Clark County was the fastest growing county in the nation. Growth is projected to continue at record rates well into the future. Clark County is -- is highly urbanized. We are an urban county, and includes the cities of Boulder City, Henderson, Las Vegas, North Las Vegas and Mesquite in addition to unincorporated Clark County, which happens to be the most densely populated.

There are over 1.3 million residents in Clark County, or almost seventy percent of Nevada's total population. The 1998 Federal census estimates -- estimates confirm that we had more residents than New Orleans, Charlotte, Salt Lake City and all its metropolitan areas.

In addition to our resident population, Las Vegas tourist based economy, which is what brings jobs and small businesses, attracts over 32 million people annually. This is equivalent to the entire population of the City of Baltimore visiting Las Vegas during any average week. This substantial augmentation of our local population is off -- often ignored in impact assessments.

In 1988, Clark County was designated by the Department of Energy as an effective unit of local government under provisions of the Nuclear Waste Policy as amended. This clearly was an acknowledgement by the DOE that the citizens and community could be impacted by Yucca Mountain program activities.

Clark County has been an active participant in the full range of Yucca Mountain oversight activities. The County has produced an extensive number of reports and analyses examining potential impacts to our community and citizens. To ensure that a broad range of public and geographical concerns were concerned, a steering committee was established with seven members and representatives from the incorporated cities in the Las Vegas Paiute Indians.

It was recognized by Clark County early on that the EIS would be a key document in describing and assessing potential Yucca Mountain impacts. Time out.

MR. LAWSON: I'll get that for you.

MS. WILLIAMS: With this in mind, Clark County provided extensive documents during the DEIS scoping in December of '95. In 1998, in response to requests from DOE for reference documents, staff provided considerable information that would assist in developing an EIS that would accurately reflect local conditions and concerns. Despite these considerable efforts on the part of staff and others, little of this information was considered or even referenced in the DEIS. As a consequence, the DEIS ignores a host of important community issues that one could reasonably expect to be considered in a project of this scope and significance.

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This is particularly disturbing considering that Clark County has been given a potentially major role in the transport of the waste to Yucca Mountain. I'll cite examples. The Las Vegas Valley beltway system currently under construction is cited as an important link for transporting waste. It should be noted that the beltway is not incorporated in the federal road network. No federal dollars have gone into the beltway. That's all our money that's building the beltway.

Two intermodal transfer sites, Apex, Dry Lake and Sloan Jean are in Clark County. Potential new rail line at Jean and at Valley Siting, the latter in the northern part of the Las Vegas Valley, are also in Clark County. US 95 and Interstate 15 routes over Hoover Dam and through the Spaghetti Bowl that have been used as recently as last year for radioactive waste shipments are also possible routing options. |

Despite this key role, there is almost no evaluation of the potential implications of transporting nuclear waste through an urbanized, congested and increasingly developing valley.

At this point, I -- I have to make a comment that's not on here. The reason -- and I believe it was verified by somebody from the DOE. These -- these impacts that we're talking about that have been calculated have been calculated in computers and documents. That's where they've been tested, okay.

MR. LAWSON: Excuse me. Before you go on, it looks like you have a couple more pages.

MS. WILLIAMS: I do.

MR. LAWSON: Do you want to summarize your final comments and submit them?

MS. WILLIAMS: No. Because I think there are specific things in here. I'm very sorry that the DOE couldn't put a tape in a tape recorder, once again, to put on the record all the comments of the people who have spoken, but I think that Clark County and my experience over the years on both of the most important commissions and committees in this state to allow me to make a full record of the very things that we are concerned about.

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| The NEPA process requires that reasonable impacts from a project be considered. There is no recognition, however, of potentially reasonable and potentially severe impacts to Clark County from potential transportation related to impacts. There was no rationale provided for what potential impacts to Clark County's tourist based economy were not examined. Potential economic impacts go far beyond the mere provision of jobs noted in the DEIS. |

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| Although the transportation of nuclear waste is a key part of the Yucca Mountain pro -- program, the DEIS provides no analysis of transportation impacts, no comparison among routes and modes at a minimum of preferred routing or mode should have been selected and evaluated. |

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| The Department of Energy has long trumpeted the effectiveness of its environmental justice program, and by the way, we got Yucca Mountain because we were little and have only two people in Congress against forty-nine other states. It is curious, then, that the evaluation of effects on minority, low income and Native American groups is totally ignored in the DEIS.

For example, US 95, a major proposed routing option, goes through the Las Vegas Paiute Reservation. Routes through the Las Vegas metropolitan area are adjacent to minority and low income populations and in close -- and in close proximity to twenty-six schools. However, there's no recognition of this in the DEIS. |

5 The DEIS also fails to evaluate cumulative impacts associated with other Nevada Test Site activities. As
an example, there's no examination of the probable use of the NTS -- Nevada Test Site -- as the disposal
site for the nation's low-level radioactive waste, which incidentally is not just medical waste and some of
it is even more dangerous than the high-level waste. This offers the potential to dramatically increase the
numbers of shipments through Southern Nevada. Given the complexity and controversial nature of the
6 project, why did DOE choose to exclude interaction with Clark County and other affected units of
government during DEIS development?

7 Closer coordination would have obviously resulted in a more accurate local information for incorporation
into the document. In light of Clark County's potential major role in transporting the waste, why weren't
potential impacts to tourism and gaming not examined? By the way, seventy percent of the revenue of
this state comes from gaming. This is by far Clark County's and Nevada's most crucial economic sector.

Why wasn't current demographic information from Clark County used in a risk analysis?

8 The County, as you're probably aware, has increased the population by -- this is an error. It's almost one-
half since 1990, since the 1990 census. The DEIS underestimates risk of those areas where development
has occurred over the past decade, dense development, dense residential and commercial development.
Why was risk so narrowly defined to exclude the risk which people considered in making everyday
decisions? What evidence can DOE provide?

9 For example, the property values would not be affected by the transportation of Yucca Mountain waste to
our community. A recent DOE study of shipments from foreign research reactors, for example, provides
evidence that property values can indeed be influenced by these shipments. Likewise, a New Mexico
Supreme Court decision confirmed in a case involving a property owner in Santa Fe that risk perception
can result in a reduction in property values. There are many other issues and questions.

10 In closing, I would like to offer several recommendations. To address the deficiencies in the DEIS,
particularly with regard to the transportation of the waste, DOE should consider the preparation of a
Supplemental Environmental Impact Statement. The lack of a comprehensive analysis of transportation
issues strongly suggests that the DEIS is an insufficient document.

11 Because of the significance of the Yucca Mountain Project and its potential impact on communities
throughout the United States, we would recommend that DOE prepare a document prior to the finalization
of the DEIS in describing how DOE intends to respond to the concerns of the public. One of those
concerns is that at the WIPP site, they allow 15 millirems of radiation. At Yucca Mountain, they're
raising it to 25.17. The EPA disagrees with that. I have to commend the EPA. They only not only
disagree with that, they want -- and so far have not received agreement -- that the groundwater be tested
and that groundwater should not contain more than 4 millirems of -- of radiation.

Clark County will as noted be providing more detailed comments prior to the deadline. As an elected
official at the County and someone who's lived here for forty years, raised my family, had my
grandchildren -- I think there are people out there who have great-grandchildren, I'm not there yet -- but I
want you to know that Clark County, of every ten people who live in the State of Nevada, seven of them,
seven live in Clark County. We are at risk. I'm looking forward to your response to Clark County's
specific questions and concerns, and I thank you. Sorry for taking extra time, but I felt it was necessary.