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- 1 MR. HELMER: My name is Bill Helmer, last name H-e-l-m-e-r. I work for the Timbisha Shoshone Tribe, EPA program director and tribal historic preservation officer. And I do not and cannot represent the tribe and that needs to be done in direct government-to government consultation and the DOE needs to come out to Death Valley in order to perform their trust responsibilities and consult with the tribe at Death Valley. And so the comments I'll make now are just speaking as an individual here.
- 2 I also agree like the others with all the comments that Richard Arnold made as spokesperson for the
3 Consolidated Group. And also 90 days, extension of 90 days I agree with for the comment period is a reasonable extension. And that hearings should be conducted all across the country, not just three hearings local to Yucca Mountain, because it is a national issue and everybody across the country needs to know about this and have a chance to comment even though they may have been sent documents because they testified previously or were on a mailing list.
- 4 Also I think that because this is such a critical issue, this nuclear waste repository, DOE needs to be much more proactive in spreading the news that this is even out with the public service announcements, television announcements, telling the American public in general that this is even out so that we even know about it to comment on.
- 5 And I agree with others that there should be funding for tribes in order to go through the technical documents. The State of Nevada has been funding counties in the area, has this funding and certainly sovereign tribal nations are on a level or above a level with counties and should also receive this funding in order to go through all these documents.
- 6 Also I think that DOE needs to be more proactive in providing the background documentation to go through documents such as this. That's just a Supplement to the Draft EIS. The Timbisha Shoshone Tribe was not sent the full document in hard copy which it's needed for tribal members and elders to go through. It was not sent the full copy of the Yucca Mountain Science and Engineering Report. It was never sent the total system performance for the site recommendation and these are two documents, important documents that are cited repeatedly in this Supplement and two years ago we requested all relevant documents to be sent to the tribe and yet this still was not done. And all these documents need to be looked at and analyzed in order to understand the Supplement.
- 7 Also, speaking about this technical document, people made comments that it's very hard to understand. One thing NEPA states is that these documents should be written in clear language so that the average person can understand these. The way this is written, just like the draft EIS, it's basically raw data and raw data isn't appropriate for these documents.

- 8 | And numerous comments were made regarding the Draft EIS and how poorly it was written, how poorly it was organized and how it was too technical and thus a violation of NEPA. That information needs to be presented to the public in a way that they can understand and yet in preparing the Supplement all those comments were ignored. That was the comment by the Timbisha Shoshone Tribe that this was ignored in the preparation of this document.
- 9 | And one last thing, too, is that the arbitrary 10,000-year limit for analysis is used again in this and there's really no explanation in the document itself, why it stops at that point. 10,000 years is a long time and the radioactive waste will last hundreds of thousands of years and that's what they need to analyze in terms of their analyzing and the uncertainties in their modeling. They have to take the life of the radioactive waste. If it's still there hundreds of thousands of years in the future, that will affect the groundwater table and it would definitely directly affect the groundwater table of Death Valley where the Timbisha Shoshone reside and also people in the area and this needs to be taken into consideration. That's all I have to say.