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The Commentors Name:
---> John M Bailey

The Commentors Address:
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Comment Text :
-->First, I don't believe that Yucca Mountain is the solution for the high-level radioactive waste problem. The site is not suitable and the risk of transporting this material across the United States represents an unacceptable environmental impact and security risk. The State of Nevada doesn't want this dangerous material shipped to their land and they should not be forced to host the depository.

The decision to use "mostly rail" shipments to haul 77,000 tons of highly radioactive wastes to Yucca Mountain, Nevada, and to build a rail line from Caliente, NV to provide direct rail access for waste shipments to Yucca Mountain represents a serious national security problem. Putting all your eggs in the train basket means that there will be larger numbers of shipments on certain railways in certain states and cities and less in others. DOE has not adequately assessed or analyzed these national impacts of its decisions. Thus, DOE's scoping process must encompass these vast implications and address the security issues faced by the impacted localities.

Citizens across the U.S. will find it difficult to be able to figure out the impacts of DOE's announcements on their communities, when DOE has not performed adequate national assessments in the past two decades? DOE should allow for 180 days of public comment and establish a marketing/outreach

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program to make sure that all citizens are aware of this process and its implications.

DOE should hold public scoping hearings for gathering public comments in the states and cities across the country that would be most impacted by its decisions. All comments received should be transcribed and posted immediately to the DOE's website to enhance public participation, knowledge and interaction.

DOE is rushing its decision on high-level radioactive waste transportation route decisions within Nevada. How can DOE select a specific rail spur route within Nevada when it has never completed an adequate nationwide transport analysis? Not only is this illogical and unsafe, it also appears to violate the the National Environmental Policy Act.

In 2002, Energy Secretary Abraham told Congress that as few as 175 train casks annually would be needed to haul waste from reactors across the U.S. to Yucca Mtn. But in DOE's rail scenario in the Final Environmental Impact Statement (FEIS) for Yucca Mountain, DOE projects that it would require 447 to 580 shipments per year. And don't forget about the 2,500 barge and/or heavy-haul truck shipments that would be required to get waste to the nearest railway?

In its March 2004 Supplemental Analysis, DOE proposed shipping smaller "legal weight truck casks" (40 tons loaded) upon rail cars (and then off-loading them in Nevada onto semi trucks for the final leg of the journey) for the first six years of Yucca Mountain operations, until the Caliente-to-Yucca Mountian rail spur is constructed that could accommodate larger rail-sized casks (100 to 150 tons loaded). But DOE itself had rejected such a proposal in its Yucca FEIS as "impractical," and leading to the "highest estimates of occupational health and public health and safety impacts" (Chapter 6, Environmental Impacts of Transportation, page 6-33; Appendix J, Transportation, J.2 Evaluation of Rail and Intermodal Transportation, pages J-74 and 75).

This proposed rail line hugs the border of the Nellis Air Force bombing range for hundreds of miles. An accidental or intentional aircraft crash or bombing of a high-level radioactive waste train could release catastrophic amounts of radioactivity impacting large areas downwind and downstream.

This railway would pass close to mining operations where accidental or intentional explosions represent a safety risk to the trains carrying nuclear waste.

As I understand land along the line has never been evaluated or inventoried for threatened and endangered species of wildlife. A comprehensive assessment of animals and plants in the targeted rail corridor must be done by an independent organization during DOE's environmental impact statement process.

This plan by DOE would trample Native American rights. The entire Caliente-to-Yucca Mountain railway would lie on lands belonging to the Western

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Shoshone Indian Nation under the Treaty of Ruby Valley, which the U.S. government signed and ratified in 1863. Such treaties with sovereign Native American tribes are the highest law of the land, equal in stature to the U.S. Constitution itself, and DOE should not violate the Treaty of Ruby Valley by building this proposed railway, or by building the Yucca Mountain dump itself.

Thanks for your time.

Sincerely

John Bailey

Institute for Local Self-Reliance

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