



Warren Reuschel <wreuschel@yahoo.com> on 01/10/2008 11:31:35 AM

RRR000851

To: EIS_Office@ymp.gov
cc:
Subject: Yucca Mountain draft Repository Supplementary EIS Comments

LSN: Relevant - Not Privileged
User Filed as: Excl/AdminMgmt-14-4/QA:N/A

Jane R. Summerson

M. Lee Bishop

Environmental Impact Statement Office

U.S. Department of Energy

Office of Civilian Radioactive Waste Management

1551 Hillshire Drive

Las Vegas, NV 89134

As a United States citizen and environmental scientist with prior NEPA document preparation and review experience, I offer the following comments regarding the Yucca Mountain Repository EIS documents:

Cumulative Impacts

The cumulative impacts assessment appears abbreviated and incomplete, based on CEQ guidelines. No approved thresholds for the potential contaminants and/or pollutants associated with the proposed action are presented or compared within the document. Further, neither a geographic nor temporal scale for the context of cumulative impact evaluations of ANY variety is clearly established; i.e. this document provides nothing in the way of cumulative impacts analysis except for vague predictive statements and unsubstantiated (within the document itself) risk values.

At a minimum, based on a review of the subject document and precursors, as well as CEQ guidelines, the subject document should be further revised to include the following topics:

- 1) Cumulative human health risk evaluations for all aspects of the proposed action and required transportation, materials handling with detailed attention to historic accident rates for all potential hazards posed, as is practical for period of record data (i.e. from day 1 of recorded human-nuclear waste interaction), population center health risks and associated economic effects for all populated areas involved - regardless of density, drawing not only on normal expected exposure levels but providing overviews of potential impacts, even if deemed unlikely.

2) Cumulative impacts to all associated groundwater resources, in light of current use as well as expected groundwater utilization increases. Further evaluation should describe these cumulative impacts to groundwater in light of other Federal, State, local, and tribal initiatives and proposed uses.

3) Cumulative impacts to all ecosystems, wildlife, and natural resources should be presented in a clear geographic and temporal context, with relevant thresholds and predictions based on best available data, with particular detail provided regarding long-term impacts to ecosystem stability, direct human utilization of resources, and broader implications for regional resource consumption and trade. Seismic activity, as an obvious geologic process-regulating force within these ecosystems, should be evaluated and results fully integrated with other cumulative impact risk scenarios, i.e., seismic activity at varying strengths and frequencies should be a modeled factor when attempting to evaluate ecosystem impacts.

4) Cumulative impacts should focus on potential impacts to cultural and historic resources; the subject document is devoid of real evaluation of potential impacts to nearby tribal lands; tribal members, and US-tribal relationships.]

Thank you for this opportunity to comment.

Warren Reuschel
Senior Environmental Scientist
St. Petersburg, Florida

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. [Try it now.](#)