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August 21, 2000

Mr. Mark Delligatti  
Office of Nuclear Material Safety and Safeguards (NMSS)  
Nuclear Regulatory Commission (NRC)  
Washington, D.C., 20555

Dear Mr. Delligatti:

Thank you for holding additional public hearings about the proposed Spent Fuel Storage Installation on the Skull Valley Reservation of the Goshute Indians.

I have reviewed the publication NUREG-1714<sup>1</sup>, and **I support the No Action Alternative.**

I disagree with the findings mentioned in Chapter 6 of the draft environmental impact statement, that the proposed storage facility would present only small concerns about environmental justice, or that it would have only positive economic benefits for the Goshute tribe.

The most lucrative industry in the state of Utah is tourism. By compromising the scenic quality of Skull Valley, the proposed storage facility will preclude some types of economic development. No one wants to visit a nuclear waste dump, or to locate their business next to it, if they have any alternatives. That is how the facility will be popularly perceived, whether true or not.

The draft environmental impact statement also indicates that any employment opportunities created by the facility pose moderate threats to the health of workers. Members of the Goshute Tribe should not have to risk their health and families' well being in order to be employed.

The facility may also pose threats to habitat of the Loggerhead Shrike and other Raptors, the Burrowing Owl, Skull Valley Pocket Gopher and some rare plants.

For these reasons I oppose the proposed spent fuel storage facility.

The Goshute Tribe has suffered from severe economic underdevelopment, and state, local and national government must support development that will provide additional financial resources

<sup>1</sup> **NUREG-1714** "Draft Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, Utah"

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for the Skull Valley Band as a whole, as well as for individual members. However, economic development must not compromise the health or environment (and its intangible resources) of the Goshute tribe – to offer economic development that degrades these Indians' homelands amounts to extortion, whether by the tribe's own leaders or the federal government.

Thank you for your consideration of my comments.

Sincerely,

Rachel White  
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Office of the Secretary, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001