

From: Deborah Gavel <djgavel@gmail.com>
Sent: Wednesday, August 5, 2020 11:13 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

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Dear NRC staff,

I am writing to submit a public comment in response to the Draft Environmental Impact Statement (Docket ID NRC-2018-0052) regarding Holtec International's application for a license to build and operate a "Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

As a resident in Albuquerque, New Mexico, I am strongly opposed to the Holtec storage proposal. I believe the impact of High Level Waste and Spent Nuclear Fuel does not belong in this extraordinary landscape.

1. New Mexico Does Not Consent The motto of the Nuclear Regulatory Commission is "Protecting People and the Environment," yet the NRC's Draft Environmental Impact Statement (DEIS) on the Holtec project does neither. **Instead, the NRC's inadequate draft EIS puts people, wildlife and precious water resources at significant risk.**

STOP THE INSANITY

The world is a precious jewel and not a wasteland!

Close down this project now and stop creating nuclear waste!

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CALL TO ACTION!!

Tell Holtec and the Nuclear Regulatory Commission (NRC): We Do Not Consent!

Submit comments to NRC by September 22, 2020

Now is the time to TAKE ACTION to stop a dishonest private company (Holtec International) from transporting all of the waste from every U.S. nuclear power plant in the country and dumping it on New Mexico. The Nuclear Issues Study Group (NISG) urges everyone to submit comments on NRC's Draft Environmental Impact Statement (DEIS) for Holtec's application to build the world's largest radioactive waste dump in New Mexico. We do not consent to dangerous national transport! We do not consent to storage of forever deadly waste from every nuclear power plant across the country, risking contamination to the land, water, wildlife, and people for millions of years!

Holtec International wants to bring 173,600 metric tons of high-level radioactive waste in the form of irradiated fuel rods to a so-called "interim" storage facility they propose to build half-way between Carlsbad and Hobbs, New Mexico. This is more than double the amount of waste that exists today. The public has until September 22nd to submit comments to NRC in response to their inadequate and misleading DEIS for Holtec's license application.

We (at the Nuclear Issues

Study Group) have reviewed the DEIS and prepared a sample letter that you can use (below), but you can also send NRC a simple note that you do not consent and your concerns about this proposal. (Learn more about the project by watching our web series "We Are Not a Wasteland: www.facebook.com/pg/NuclearIssuesStudyGroup/videos) The NRC determined that Holtec's project will have "small" or "no" environmental impacts despite tens of thousands of comments against this reckless and irresponsible project submitted during the 2018 scoping period. In addition, 19 resolutions have been passed throughout New Mexico and Texas banning the transportation of high level radioactive waste...voicing clear opposition to this proposed site. New Mexico's congressional leadership, the All Pueblo Council of Governors, New Mexico Governor Michelle Lujan



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Grisham, and NM Land Commissioner Stephanie Garcia Richard have all strongly come out against this project. The message is clear: New Mexico and the wider Southwest DO NOT CONSENT to becoming the nation's dumping ground for forever deadly waste.

HOW TO SUBMIT WRITTEN COMMENTS VIA EMAIL:

1) Copy and paste the Sample Letter below into the body of a new email. This is now your letter, your voice, please personalize to make it your comment.

2) Copy and paste into Subject line:

Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

3) Enter your name at the end of the letter (address, city and state are OPTIONAL)

4) Email to: Holtec-CISFEIS@nrc.gov and please CC: your elected officials and members of congress, as well as NISG (protectnewmexico@gmail.com)

Please note: NRC publishes all written comments online, so you may want to keep your personal contact information private.

Please act now to protect New Mexico from forever deadly "mobile Chernobyls."

For more information on why Holtec's proposed interim storage project is a bad idea for New Mexico and all communities along transport routes, email the

Nuclear Issues Study Group: protectnewmexico@gmail.com.

***** SAMPLE LETTER *****

Send to: Holtec-CISFEIS@nrc.gov

Subject: Docket ID NRC-2018-0052 Draft Environmental Impact Statement Comment

Dear NRC staff,

I am writing to submit a public comment in response to the Draft Environmental Impact Statement (Docket ID NRC-2018-0052) regarding Holtec International's application for a license to build and operate a "Consolidated Interim Storage Facility for Spent Nuclear Fuel and High Level Waste" (NUREG-2237).

I am strongly opposed to the Holtec storage proposal because [...Please insert personalized comment here].

1. New Mexico Does Not Consent

The motto of the Nuclear Regulatory Commission is "Protecting People and the Environment," yet the NRC's Draft Environmental Impact Statement (DEIS) on the Holtec project does neither. Instead, the NRC's inadequate draft EIS puts people, wildlife and precious water resources at significant and potentially, deadly risk by failing to heed the concerns of the community. We join the All Pueblo Council of Governors, New



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Mexico Governor Michelle Lujan Grisham, New Mexico State Land Commissioner Stephanie Garcia Richard, more than a dozen county and city governments, the Alliance for Environmental Strategies, the New Mexico Cattle Growers Association, the Permian Basin Coalition of Land & Royalty Owners and Operators, the Nuclear Issues Study Group, and the more than 30,000 residents who commented during the 2018 scoping period in vehemently opposing bringing the nation's high level radioactive waste from nuclear power plants to our communities. We do not consent to becoming a nuclear wasteland for millions of years.

2. Cumulative Impacts

The DEIS is inadequate because it fails to consider cumulative impacts from the damage the nuclear industry has already inflicted on New Mexicans for the past 75 years: uranium mining and milling in the northwest on indigenous Diné and Pueblo lands, including the 1979 Churchrock Disaster; radioactive contamination to Tewa lands and people from the Manhattan project in the Los Alamos area; fallout on downwinders from the Trinity Test in the Tularosa basin; the Waste Isolation Pilot Plant, which has already accidentally released dangerous amounts of radiation and now wants to expand; the URENCO uranium enrichment plant in Eunice; the world's largest nuclear warhead stockpile on the edge of Albuquerque; and the toxic threat to Albuquerque's aquifer by the Mixed Waste Landfill. Rather than adding 173,600 metric tons of high level radioactive waste to a state that has already been grossly overburdened, the United States should be directing its resources towards cleaning up the contamination already present in our communities, just compensation, and holistic community health studies. The DEIS also fails to account for cumulative impacts from the other proposal for Consolidated Interim Storage, approximately forty miles east at the current Waste Control Specialists low-level radioactive waste site.

3. Environmental Racism

It's no coincidence that the United States wants to make New Mexico a nuclear wasteland. It ranks as one of the poorest states and is a majority minority state, with more Black, Indigenous, People of Color (BIPOC) residents than white residents. For the NRC to determine that nuclear waste which will threaten life for millions of years would have "small" or "no environmental impact" is a blatant violation of environmental justice principles and is environmental racism in action. We do not give our own government license to allow a private industry to further contaminate our home or to expand the massive nuclear burden we already bear.

4. Threats to Cultural Properties & Historic Sites

Holtec International and the NRC would have us believe that the site is a desolate, uninhabited place with "no historic value or significance." This statement is completely false and without merit. The site is located near or on two lagunas or playa lakes: Laguna Gatuna and Laguna Plata. Lagune Plata is an archaeological district that has been extensively studied for decades. Two sites near Laguna Gatuna, where the nuclear waste is proposed to be stored, are listed on the National Register of Historic Places. Archaeologists have found a plethora of evidence of the Jornada Mogollon people, dating from 200 AD, 700 AD,



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and 1200 AD. More than 200 archeological sites are located within six miles of the proposed nuclear waste dump. Laguna Gatuna, while often dry, fills with water after monsoon rains, attracting a variety of wildlife and hunters for millenia. The Hopi and Mescalero Apache nations have identified the area as culturally significant to them, and the Hopi nation has informed the NRC that traditional cultural properties could be adversely affected if this project proceeds. The site where Holtec wants to dump tens of thousands of tons of radioactive waste has profound historic value and significance.

5. Threats to Water & Wildlife

The impact of this forever deadly nuclear waste would have devastating consequences on wildlife including threatened species that rely on the lagunas for drinking water and surrounding area as a critical habitat, including the Lesser Prairie Chicken, and the Dune Sagebrush Lizard. Agencies such as U.S. Fish & Wildlife, New Mexico Game & Fish, the Environmental Protection Agency (EPA) and New Mexico Environment Dept (NMED) have all gone on record attesting to the significance of Laguna Gatuna for migratory birds, and have argued that it should be designated permanently as a Water of the United States (WOTUS), which would make it eligible for protection under the Clean Water Act.

6. Threats from Transporting Irradiated Nuclear Fuel

Not only New Mexico would be adversely impacted by the Holtec project: all communities along the transportation routes between nuclear power plants and the Holtec proposed site would be threatened by radiation from the rail cars, and from the devastating financial and environmental damage if an accident or act of malice should occur. Studies have shown that one accident is likely to occur for every 10,000 shipments. It is irresponsible and dangerous for NRC to avoid inclusion of these mammoth risks and liability in its DEIS for Holtec's application.

7. Holtec's Project is Illegal

Finally, under current U.S. law, this project is illegal. The Nuclear Waste Policy Act of 1982, as amended, does not allow the federal government to take title to the high level radioactive waste until a permanent geologic repository is operating. So the federal government cannot pay for transportation and storage of the waste as Holtec wants. The license cannot be issued until either a permanent repository is operating, or U.S. law is changed.

For all the above reasons and more, I declare that the DEIS for Holtec's application is inadequate and further that the license for a high level radioactive waste storage facility should be denied. In conclusion, high level nuclear waste from nuclear power plants around the U.S. should not be brought to New Mexico—it should be isolated on or near the current site until there is an environmentally just and scientifically sound option is available.

Sincerely,

[Enter Your Name]

[Enter Your Address, City and State (Optional)]



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Open with



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DG

Deborah Gavel

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Federal Register Notice: 85FR16150
Comment Number: 2185

Mail Envelope Properties (CAGeSs96TWcJxHzwAVkOLHnBf9HiYXZNusOgn8a8+GqEDqofGuQ)

Subject: [External_Sender] Docket ID NRC-2018-0052 Draft Environmental Impact
Statement Comment
Sent Date: 8/5/2020 11:13:29 AM
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From: Deborah Gavel

Created By: djgavel@gmail.com

Recipients:

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	12958	8/5/2020 11:13:47 AM
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image.png	2811	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
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