



**Amargosa Conservancy verbal comments on the
Yucca Mountain Nuclear Waste Repository Supplemental EIS**

**Public meeting at Amargosa Valley Community Center, Amargosa Valley, NV
September 17, 2015**

Good evening. My name is Patrick Donnelly, and I'm the Executive Director at the Amargosa Conservancy, a non-profit based just down the river in Shoshone, California. The Amargosa Conservancy has been actively involved in groundwater issues in the Amargosa Basin for eleven years, and has long maintained opposition to the Yucca Mountain Nuclear Waste Repository.

I will not claim any particular expertise on radionucleotide transport in complex aquifers, and as such I am not speaking tonight to take exception with the conclusions of the EIS. Rather, tonight I would like to offer comments that the models and data being utilized as the basis for the analysis in this Supplemental EIS are out of date and insufficient.

The Nature Conservancy and the Amargosa Conservancy have funded hydrogeological investigations in the waters of the Middle Amargosa Basin- the Shoshone and Tecopa area- for a decade. These investigations have revealed new knowledge about the sources of the water flowing from our abundant and life-giving springs, and have also confirmed beyond a doubt ideas about the water which were long speculated on but never known for certain. This work has been most recently reported by Andy Zdon, in his "State of the Basin Report 2014," which we will be happy to provide to the Nuclear Regulatory Commission and any other interested parties.

The most pertinent conclusion of the State of the Basin Report to the current discussion is that there is indeed a hydrologic connection between the Amargosa Desert and the springs of the Middle Amargosa Basin. This connection is greatest at the springs on the western side of the Basin, particularly Shoshone Spring and Borax Spring. Waters emerging from those springs at least partially originated right here where we stand this evening.

The analysis presented in the EIS ignores this connection. Section 2.2.2 says that transport beyond Alkali Flat is "unlikely," and then denigrates our stretch of the River as "small, intermittent springs." I would encourage each person involved in the preparation and evaluation of this EIS to travel down the river to Shoshone and Tecopa- your "small, intermittent springs" are perennial gushers, flowing at hundreds or even thousands of gallons per minute every day of the year.



If this EIS will entertain scenarios as remote as one million years from now, and will analyze numerous possibilities of flowpath and contaminant transport, then it is essential to add to this Supplemental EIS an analysis of potential impacts to the ecology and communities which rely on groundwater discharge in the Middle Amargosa Basin.

Thus, the present analysis is incomplete. The Middle Amargosa Basin is home to critically endangered species such as the Amargosa vole, the least Bell's vireo, and several species of pupfish. Analysis needs to be conducted on these species, and if this reveals even a remote possibility of impacts to endangered species or their habitat, a Biological Opinion from the US Fish and Wildlife Service should be required.

Additionally, based on the connections previously described, there is a significant environmental justice issue that needs to be addressed. The community of Tecopa is federally designated as Severely Disadvantaged. Our economy is entirely reliant on eco-tourism, and those tourists come for one reason only: to experience the wonder of our waters and the biodiversity that they support. If the Amargosa River becomes a toxic waste dumping ground, our economy will suffer. While people here in Nye County may relish the thought of high-tech jobs, our severely disadvantaged community will get none of those jobs. Instead, the jobs we currently have will wither on the vine, because what tourist wants to visit a nuclear waste dumping ground? We will experience the negative impacts that people up here in Nye County be less concerned about. It is unjust to dump the impacts of nation's nuclear waste problem on a severely disadvantaged community. This needs to be considered in your analysis.

Finally, and more broadly, the entire 30 year environmental review process for Yucca Mountain has been a charade. Since 1989 and the "Screw Nevada Bill," there has been no substantive evaluation of program alternatives, which is a requirement of NEPA. Since the only site being considered is Yucca Mountain, the NEPA process has turned into DOE, or in this case NRC acting in their stead, justifying a foregone conclusion.

A true NEPA analysis would do a comprehensive search for a suitable solution to a problem. And that best solution would likely not end up being a mountain in an active faulting zone with recent volcanic history and a population of human beings just a few miles away.

Our communities of Shoshone and Tecopa are united in our opposition to Yucca Mountain. The analysis presented in the EIS Supplement and in previous EISs is insufficient, and the Middle Amargosa Basin must be analyzed in this supplement. Additionally, past EISs need to be updated to reflect the latest science and data. To do anything less is to subvert both the letter and intent of the National Environmental Policy Act.