



**Board of County Commissioners
Nye County
Tonopah, Nevada**

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RRR000656

January 10, 2008

Dr. Jane Summerson
EIS Document Manager
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
1551 Hillshire Drive, M/S 011
Las Vegas, NV 89134

Re: Nye County's Comments on

- (a) Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada – Nevada Rail Transportation Corridor DOE/EIS-0250F-S2D**
- (b) Draft Environmental Impact Statement for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada DOE/EIS-0369D**

Dear Dr. Summerson:

As the situs jurisdiction for the Yucca Mountain Project (YMP), Nye County has a tremendous stake in the outcomes of the federal geologic repository development process. Nye County needs to be certain that construction and operation of the repository and associated transportation systems provide for the safety of Nevada citizens and do not cause undue environmental, socioeconomic or other impacts. We will continue to pursue all available opportunities to participate in the EIS process to ensure that impacts are identified and mitigated. We anticipate working closely with the Department of Energy (DOE) to ensure that the objectives and protections defined in Nye County's Community Protection Plan (attached) are integrated into the construction and operation of the repository and its attendant transportation systems.

We appreciate the opportunity to submit comments on the subject environmental documents. Comment Sheets with references to specific sections, paragraphs and pages are attached. The following comments summarize our concerns with the ways the two environmental documents address the overall issue of rail transportation in Nevada and the nation.

Rail Transportation

- 1 1. [Nye County appreciates that the preferred alternative now includes, by definition, shared use of Nevada Rail by commercial freight operations.]
- 2 2. [The total transportation system to support the repository program should be optimized from logistical and economic, rather than political perspectives. Transportation options that are operationally superior, or that offer mitigating economic benefit to the affected population, should not be rejected for politically expedient reasons.]
- 3 3. [Given that the preferred alternative includes shared use by commercial freight, there should be greater consideration of the integration between national rail transportation and operations via Nevada Rail. Selection of a rail corridor, in particular the Caliente Corridor, that dead ends at Yucca Mountain, is less than optimum on several levels:
 - A through-going rail system (e.g. Caliente to Yucca to Jean or Mina to Yucca to Jean) would maximize national transportation options and the flexibility of the Class 1 railroads on the major northern and southern, east to west rail routes.
 - Nye County's *Rail Transportation Economic Impact Evaluation and Planning Study for the Caliente and Mina Corridors*, November 2007 (Attached) conservatively estimates the annual economic development value of the Mina Corridor, even as a dead-end spur, to be \$401 million as compared to \$21 million for the Caliente Corridor.
 - In constructive response to political opposition, a through-going route would eliminate the necessity for rail shipments through the Las Vegas Valley where government leaders are concerned about the effects of nuclear waste shipments on the tourism industry. A through-going route would also obviate the need for rail shipments through central California to connect with either corridor from the north (Mina or Caliente). In other words, having both northern and southern approaches to the repository would add flexibility to the national shipping program by enabling north-south and east-west rail corridors to accommodate seasonal (weather), construction, and load/density considerations.
 - A through-going rail system would also enable more effective and efficient movement of waste shipments than would a single dead end spur line, reduce the number of rail shipments that would arrive at Yucca Mountain from any one direction, facilitate shipment of construction materials for the repository, and enhance the utility and economic benefit of the line for commercial shippers.

- In the larger sense, a through-going railroad (via Mina and Jean) would add another rail link between the Port of Oakland / San Francisco Bay Area and both the Las Vegas and the Los Angeles metropolitan areas and thereby provide a major enhancement to the flow of commerce in Central Nevada and the along the western seaboard. It is incumbent on the federal government to put the investment of billions of dollars of public funds for rail transportation to greater and more beneficial purpose than the movement of radioactive waste. A through-going shared-use rail line would maximize benefits to local communities, the state, and the region.
- The cost of construction estimated by DOE is \$1.7 billion for the Mina route versus \$2.2 billion for the Caliente route. For the cost of the preferred Caliente route, the Mina route could be made much more functional and beneficial for both nuclear waste shipment and shared commercial freight. Making Mina a through-going route would provide superior advantages at a reasonable cost when compared to those of a single spur terminating at the repository.]

4 4. [The EIS is predicated on only one implementation and ownership alternative, assuming that DOE is the sole entity engaged in specifying and procuring the line, facilities, equipment and services. Given that shared use is part of the definition of the preferred alternative, alternative implementation and ownership models may afford greater advantage to state and local entities, may be more economical and efficient of public expenditure for construction and operation, and may engender greater public support for the facility. Other implementation and ownership models should be considered among the alternatives and/or addressed in the socioeconomic effects section of the EIS, to more thoroughly quantify the potential benefits and economies of the facility.]

5 5. [The discussion of abandonment at some point in the future indirectly and insufficiently addresses the potential value of the Nevada Rail facility to the communities and businesses served by the selected route. At the time that nuclear waste shipment operations cease, the commercial value of the railroad should be assessed and its ownership and operations optioned to the state, local authorities, or private rail operator(s).]

6 6. [We do not believe that that Congress is likely to fund construction of Nevada Rail until it has greater assurance that DOE will receive a license to construct. If that proves to be true, there is time to consider and select a transportation system, especially a Nevada Rail system that is optimized from logistical and economical perspectives. Considering the unknown costs and impacts of the Caliente Route, the DOE needs to further examine the entire Mina Route, including further mitigation with the Walker River Paiute Tribe, greater consideration of alternative routes around the Walker River Paiute Reservation, and adding the Jean corridor to complete a through-going route. To this end, Nye County suggests that DOE

keep its options open and use the next three years to put together an integrated transportation system that satisfies the concerns outlined above.]

7 [Radiological Safety Analysis Significantly Overestimates Consequences

Even though the calculated risks to workers and the public are extremely low in most cases, the methods the EIS employs to calculate the risk inherently overestimate the radiological consequences. The overestimates are typically caused by severely conservative input assumptions. For instance:

- The EIS assumes radiation emitted from transportation casks is at the regulatory limit instead of using historical measures of average radiation. Even with this assumption, the EIS presents numerical dose estimates that are so low that they could not be measured compared to everyday background radiation. Such very low estimates should be stated as being “negligible” or “near zero” instead of such a tiny number.
- The EIS assumes one worker receives the maximum allowed radiation dose of 500 milirem per year for 50 years causing a total exposure of 25 rem. This is totally unrealistic.
- For severe transportation accidents the EIS assumes that none of the nearby population leaves the area promptly and that everyone is exposed to contamination deposited on the ground for an entire year with no interdiction or cleanup. Such a circumstance for any significant contamination is not possible. Other assumptions such as near worst case weather add to significant overestimate of consequences.
- The EIS presents a compelling argument that security measures will be in place that would likely prevent any successful sabotage event. It then goes on to produce consequence estimates for an assumed optimally successful sabotage event with nobody promptly leaving the scene of the event.

In addition to the overestimates of consequences, the EIS inappropriately presents results of severe accidents and sabotage as a statistical projection of increases in lifetime cancer fatalities. In the event of a severe accident or successful sabotage, a more meaningful projection would be of immediate health effects. The EIS should very clearly report that for incident free transportation, almost all credible accident scenarios, and reasonably likely sabotage scenarios attempt that the most likely result is no immediate health effects – with only a small statistical increase in possible lifetime health effects.

Nye County supports the position documented by the Health Physics Society recommending, “... against quantitative estimation of health risks below an individual dose of 5 rem in one year or a lifetime dose of 10 rem in addition to background radiation. Risk estimation in this dose range should be strictly qualitative accentuating a

range of hypothetical health outcomes with an emphasis on the likely possibility of zero adverse health effects.”

Overestimates of risk and the reporting of negligible risk as meaningful, serve to misinform the citizens near the repository and transportation routes. While the writers of the EIS may see the need to bound or envelope its environmental impact analysis to ensure that the analysis does not have to be frequently redone, realistic estimates would be more informative to those who receive the impacts.]

8 [**No Reasonable No-Action Alternative is Addressed**

The EIS states that there would be no impacts to existing conditions if no rail alignment in either the Mina or Caliente corridor was selected. This would only be true if DOE developed no transportation to the Yucca Mountain Repository which is obviously not the intent. The EIS should recognize a true no-action alternative is what would or could happen if the Proposed Action is not implemented – not a declaration that there would be no impacts. Likely, DOE would select an alternate rail corridor or trucking option that it has already analyzed in the repository FEIS and SEIS. Impacts associated with such alternatives would be very similar to those associated with development of either the Mina or Caliente corridors and could be developed in further detail should the current transportation proposed action not be implemented.]

9 [**Nye County and DOE Need to Agree to Implement an Adaptive Management Program**

The Council on Environmental Quality (CEQ) addressed the potential for using adaptive management in the NEPA process in “The National Environmental Policy Act: A Study of its Effectiveness After Twenty-five Years” (CEQ 1997c). The study concluded that a “major difficulty with the traditional environmental impact analysis process is that it is a one-time event”. Unfortunately, the process does not account for unanticipated changes in environmental or social conditions, inaccurate predictions, or subsequent information that might affect the original mitigation measures. The adaptive management model, by adding “monitor and adapt,” was seen as a significant improvement.

Although extensive studies, analyses, and modeling were conducted for Nevada rail transportation, a level of uncertainty remains regarding potential environmental and social impacts. Therefore, adopting an adaptive management approach, which would include the implementation of an adaptive management plan (a Nye County/DOE partnership agreement), would provide DOE with a clear process for monitoring various parameters and adapting management decisions and mitigation measures as needed.]

10 [**Partnership Agreement**

As the situs county of the repository and the bearer of most of the burden associated with repository development Nye County should be given special consideration to mitigate the profound localized impacts to the county. The EIS should recognize existing DOE/Nye County cooperative activities and should commit to preferential employment,

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procurement, and placement of ancillary facilities by means of a dedicated partnership agreement.]

|| **Integration of Planning Efforts**

The Yucca Mountain repository program is central to the nation's overall energy policy, including the disposition of Greater Than Class C waste, the Global Nuclear Energy Partnership, on site and interim storage, advanced fuel recycling as well as spent nuclear fuel and defense high level waste. The cumulative impacts of these programs as well as other federal activities within the county need to be recognized. The Nye County perspective is documented in the Draft Repository SEIS, Section 8.6.2 (attached) and is included here by reference.]

Sincerely,



Joni Eastley, Chairman
Nye County Board of County Commissioners

Attachments: Nye County Community Protection Plan
Comment Sheets
Rail Transportation Economic Impact Evaluation and Planning Study for
the Caliente and Mina Corridors
Draft SEIS, Section 8.6.2

cc: Nevada Congressional Delegation
Nevada Legislative Committee on Nuclear Waste
Nevada Agency on Nuclear Projects
Nye County Board of County Commissioners
Affected Units of Local Government
Darrell Lacy, Director, NWRPO

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3. Document Title: Draft Supplemental Environmental Impact Statement ... DOE/EIS-0250F-S2D and Draft Environmental Impact Statement ... DOE/EIS-0369D			
4. Document No. /Rev: DOE/EIS-0250F-S2D and DOE/EIS-0369D		5. Date: October 2007	
6. Reviewer Name: Nye County NWRPO		7. Organization: Nye County Nuclear Waste Repository Project Office	
8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
12 1	Table S-1. Potentially affected resources – Mina rail corridor. Page S-18	Operations phase only Incident-free radiological impacts (latent cancer fatalities) Public (0.00082) Workers (0.33)	These numbers are too small to be significant. The dose for the public is absurd and should be changed or characterized as close to zero.]
13 2	Table S-1. Potentially affected resources – Mina rail corridor. Page S-18	Operations phase only Radiological transportation accident fatalities Radiological accident risk (latent cancer fatalities), 0.0000074	What about workers, public or emergency responders? Value appears very low, accident not very severe. The values should be characterized or restated as close to zero.]
14 3	Table S-2. Updated environmental information for the Carlin rail corridor. Page S-21	Occupational and public health and safety Transportation hazards (construction only) Traffic fatalities Yucca Mountain FEIS: 1.1 Updated analysis: 4 Cancer fatalities Yucca Mountain FEIS: 0.14 Updated analysis: 0.6	Why did these values more than triple? The reason is not obvious from other changes in the table. The differences are due to changes in assumptions (e.g., number of shipments) combined with a change in the dose coefficient. DOE should explain any significant changes in results from the FEIS.]
15 4	Table S-2. Updated environmental information for the Carlin rail corridor. Page S-22	Occupational and public health and safety Radiological transportation accident fatalities Radiological accident risk (latent cancer fatalities) Yucca Mountain FEIS: 0.000000037 Updated analysis: 0.000001	Why did this increase two orders of magnitude? These figures are truly absurd, real answer is likely "zero." And should be restated or characterized as close to zero.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
16 5	Table S-2. Updated environmental information for the Carlin rail corridor. Page S-22	Occupational and public health and safety Nonradiological transportation accident fatalities Spent nuclear fuel and high-level radioactive waste transportation Yucca Mountain FEIS: 0.54 Updated analysis: 0.31 Construction and operations workforce Yucca Mountain FEIS: 0.7 Updated analysis: 3.3	Again, why did this go down and others (in particular previous one) go up? Note, radiological incidents are insignificant except small number for worker exposure. DOE should explain any significant changes in results from the FEIS.]
17 6	Table S-3. Updated environmental information for the Jean rail corridor. Page S-24	Occupational and public health and safety Radiological transportation accident fatalities Radiological accident risk (latent cancer fatalities) Yucca Mountain FEIS: 0.000000015 Updated analysis: 0.0000018	These figures are truly absurd, real answer is likely "zero." And should be characterized as such.]
18 7	S.2.6/p S-19 to S-29	Discusses new environmental information regarding the Carlin, Jean, and Valley Modified corridors.	The comparison to the FEIS information is difficult to understand and meaningless. DOE should provide a side-by-side comparison of these 3 corridors to the Mina and Caliente corridors. In addition, other information that is relevant to rail corridor selection, such as cost, should be included as was done in the FEIS. Such a comparison would likely show that the declaration of Mina or Caliente as the environmentally preferable rail corridor is not so clear cut. It could easily be argued that the shorter routes through less rugged terrain that disturbed far less land would be environmentally preferable. This comment also applies to Section 1.5.2, page 1-15, Table I-1, third item dealing with Scope of Rail Alignment EIS; and Section 5 in its entirety.]

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19 8	S.2.9/ P S-30	There is no information relevant to environmental concerns that would warrant further consideration of the Carlin, Jean, or Valley Modified rail corridors.	DOE should acknowledge and take care not to imply that the Carlin, Jean, or Valley Modified have ever been determined to be environmentally unacceptable. If for some reason both the Mina and Caliente corridors prove infeasible for a branch rail line, rail transportation is still preferable to other modes and reconsideration of the alternative corridors should take place. This comment also applies to similar text on page FW-3; Section 1.3, page 1-6; Section 1.3.3, page 1-9; Table 1-1, page 1-17.]
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20 9	1.1/p 1-6	This section has a great deal of information about the process to consider and select potential rail corridors, but does not have a comprehensive statement of Need. The Need for the project is not only the permanent repository for spent fuel, but also contributing to the betterment of the local communities affected by the DOE action. Need is addressed in the Supplemental EIS by studying Shared Use of the rail corridor by local shippers.	Prior to defining this option, the Supplemental EIS should more broadly define and explicitly state the need to include the economic deficiencies in the local communities that the project can help overcome, such as: <ul style="list-style-type: none"> • Limited transportation infrastructure for local businesses to be competitive with and access national and international markets • Limited opportunity for local businesses to participate in the construction and operation of DOE facilities • Lack of local job opportunities in the study area and the economic benefits derived from increased employment • Limited tax base underscored by the undiversified economies of the counties in the study area • Availability of land without the infrastructure to fully utilize the land for the benefit of the local communities]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
10	1.3.1/p 1-8	this section says, "the public stated that DOE should avoid rail corridors in the Las Vegas vicinity."	DOE has mistakenly taken the concerns of the public in Nevada as applying to DOE's defined rail corridors. The concern is more likely that shipments of SNF and HLW should not go through Las Vegas or vicinity. DOE should directly address the number of shipments that are projected to go through Las Vegas for each corridor alternative by virtue of its rail corridor selection decision. Whether or not the shipments are on new track in a "corridor" or on existing track on the main line is irrelevant and DOE has not addressed this issue.
11	2.2.1.2/p 2-4	Schurz Bypass Options	The document should explain why it would not be practical to bypass the Reservation. This would include the fact that there is difficult topography and significant cost implications. As it is, bypassing Schurz seems an obvious answer to the objections of Reservation residents, but challenge of doing so was left unexplained.
12	3.2.1/p 3-2	Table 3-1 states in the socioeconomics listing that most rail construction workers would live in Clark County and the Carson City/Washoe County area.	Nye County has a different view that has been included in the Repository SEIS. This view should also be recognized in this Rail Corridor SEIS.
13	3.2.1.2/p3-10	Here and elsewhere. Montezuma Option 2 should conform to alternate routes suggested for the Caliente Corridor, or vice-versa.	As suggested in comment.
14	3.2.7.2.1.1/p 3-41	DOE estimates 50% of workers would come...	Nye County recommends that special efforts be undertaken to assure that preference be given to hiring workers residing in Nye County and the other transportation impacted counties.
15	3.2.7.2.1.2/p 3-42	Nye and Mineral Counties would be unlikely to experience noticeable changes in economic measures.	Nye County could experience significant beneficial impacts from local citizens being employed in rail construction. This is particularly true if rail construction extended for a period of ten years.
16	3.2.7.2.1.3/p 3-43	Impact on local health care would be greatest in Nye.	Nye County appreciates DOE's acknowledgement that the construction and operation of the railroad, and repository, will have an impact on our health care system. Nye is anxious to discuss mitigation measures with DOE.

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
28 17	4.2.1.2.1/p 4-6	.. a four-lane access road from Highway 95 to the Gate 510...	Nye County advocates the early construction of access roads to the repository, and in other areas where needed. Such construction should precede rail construction and repository construction to facilitate the safe movement of employees and construction materials.]
29 18	4.2.1.2.1/p 4-7	Ancillary facilities will be constructed to support the repository	Nye County is in the process of identifying how various ancillary facilities can be incorporated into the community. Nye County appreciates the opportunity to be part of the DOE's planning process to assure that such facilities are consistent with community goals. Facilities such as the training facility, Project Prototype Testing, Sample Management Facility, warehousing, and similar facilities are projected to be housed in the Crater Flat industrial park or the YMP Gateway development.]
30 19	4.2.1.2.1/p 4-7	The Global Nuclear Energy Partnership (GNEP) program has the potential to have significant impact on the scope of the YMP and, if recycling facilities are built in proximity to the repository, to have significant impacts on the situs county.	Nye County will encourage DOE to include Nye County in discussions and planning for the GNEP so that the County can be prepared for any resulting impacts.]
31 20	4.2.1.2/p 4-8 and 4-9	The possibility exists that the YMP and NTS will experience additional shipments of nuclear waste materials. LLW shipments are expected to continue for many years due to facility decommissioning and remediation.	A coordinated effort to evaluate the cumulative impacts to Nye County caused by all waste shipments should be conducted and mitigation measures identified to limit the impacts to local communities and residents.]
32 21	4.2.2.4.4/p 4-27	Offsite contamination from historic DOE activities on the NTS are poorly defined. Information suggests that off-site contamination may exist within the proposed transportation corridors.	Nye County is anxious to identify the extent and significance of any off-site radioactive contaminated media. Nye County will be proposing a DOE/Nye County study to examine whether or not this is an issue, and if so, a plan for dealing with such contamination.]
33 22.	4.2.2.6.1/p 4-28	Traffic accidents are a concern due to the increase in the volume of both automobile and truck traffic.	Every effort should be made to upgrade the existing highways in the vicinity of the repository and along other transportation routes. Nye County expects that such upgrades will occur before YMP rail or repository construction begins. In particular, Highway 95 must be expanded to four lanes from Mercury to Lathrop Wells.]

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34 23	4.2.2.7/p. 4-29	Long term economic development potential would be limited and related to railroad construction.	Although construction could mean a beneficial increase in employment and local purchase of materials, any long term benefit to local economies will be associated with shared use of the railroad. The Nye County study of economic impact from shared use clearly predicts a substantial economic benefit to all the transportation impacted counties. This benefit may out-live the repository.
35 24	4.2.2.7/p 4-32	Cumulative traffic impacts would generally not be sufficient for major upgrades of regional roads.	Nye County believes that such a prediction cannot be made with existing information. Nye County recommends that a DOE/Nye County cooperative evaluation be initiated to monitor socioeconomic impacts to document the actual impact of rail and repository construction and operation. If unacceptable impacts are documented, it is expected that DOE will assist local entities in mitigating the impacts.
36 25	4.3.1.6/p 4-38	Due to the mostly rural nature, we expect the socioeconomic impacts to Nye County to be significantly greater than the urban regions referred to.	DOE should work in conjunction with the local communities to identify how the location of such facilities as work camps, sidings, and maintenance facilities can have a positive local impact. Such joint efforts should begin as early in the planning process as possible and continue through design and construction.
37 26	6/p 6-1 and Appendix C	Conclusions. Development of Alternatives	An alternative route around the Reservation was identified years ago but not examined or compared to the other major corridors. Nye County believes that the alternative (called 6-A) should be re-examined because new information that suggests that the Mina route has both economic development and cost-to-construct advantages and the disappointing decision of the Walker River Paiute Tribe.
38 27	Table 1-1/ p1-23	Comment regarding rail alignment in Crater Flat suggests that DOE modified the original concept regarding the location of sidings.	The diagrams and text in the EIS do not support a change in the location of sidings. See comment 30 below.
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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
39 28.	Figure 2-9/p 2-22	Location of Maintenance of Way facility.	Nye County recommends that a joint DOE/Nye County planning group be formed to discuss the specific locations of such facilities. The objective is to maximize the economic benefits to the local communities and to assure that rail and repository facilities are located and constructed in a manner consistent with local development plans.]
40 29.	Figure 2-10/p 2-24	Location of construction camp.	Previous discussions with DOE officials suggested that a construction camp would be located adjacent to the "un-named road" shown at the bottom of this figure. Nye County recommends that a DOE/Nye County planning group be formed to discuss the specific locations of such facilities. The objective is to maximize the economic benefits to the local communities and to assure that rail and repository facilities are located and constructed in a manner consistent with local development plans.]
41 30.	Figure 2-11/p 2-25	Location of construction camps	See note above regarding the construction camp located near Cat Canyon Road. Also, a construction camp is shown as being located within the YMP land withdrawal area. Nye County recommends that this camp be moved to a location immediately north of the land withdrawal boundary where we were told a siding would be constructed. This location would be consistent with Nye County plans for an industrial park adjacent to the railroad and siding.]
42 31.	Figure 2-16/p 2-34	Location of Montezuma option 2 & 3	Suggest that options for this corridor and Caliente Corridor be consistent.]
43 32.	2.2.2.2/ p 2-44	If needed, DOE might utilize construction camp 12 for repository construction activities beyond....	Nye County would like this camp to be located in Crater Flat, in the proposed industrial park, just outside the land withdrawal boundary. Such a location could bring positive benefits to Nye County and avoid the costs for DOE associated with dismantlement.]

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44	2.2.2.2/p 2-47	..DOE would consult with the BLM regarding abandonment and reclamation of the construction camps.	Nye County recommends that a DOE/Nye County planning group be established to assure that any abandonment plans are consistent with County needs and plans. Construction camps may provide economic development opportunities to nearby communities and the local citizens should be consulted on future use possibilities and reduce DOE costs.]
45	2.2.2.5/p 2-66	It is implied that DOE will use best engineering practices with regard to bridges, culverts and grade crossings.	It is particularly important that local ranchers be provided with adequate cattle crossings facilities. In addition, it is important that back-country recreational areas remain accessible. It is assumed that any grade crossings will comply with applicable state and federal highway guidelines and specifications.]
46	2.2.3.1/p 2-80	It is projected that DOE usage will result in an average of 17 one-way trains per week. Commercial usage will increase this traffic by a significant amount (223 to 514 carloads weekly).	If the traffic volume projected here is realized, this will be a busy railroad. Nye County has recommended that a through-going rail line, connecting the northern main rail line with the southern main line, be considered. Such a through-going route would reduce the volume of traffic on either the northern or southern portion of the rail line.]
47	2.2.3.1.1/p 2-82	A through-going rail line may require an intermediate staging area for temporary storage of casks waiting out-shipment.	The proposed industrial park located in Crater Flat would be an ideal location for an intermediate staging area.]
48	Table 2-27/p 2-88	Maintenance-of-Way Headquarters Facility.	It seems logical to locate this headquarters facility in the same place as the track-side facility. For convenience, it would seem logical to locate both facilities close to Highway 95.]
49	2.2.4.1.2.2/ p 2-99	Maintenance-of-Way Headquarters Facility.	It seems logical to locate this headquarters facility in the same place as the track-side facility. For convenience, it would seem logical to locate both facilities close to Highway 95.]
50	Figure 2-53/p 2-106	Septic tank facility	Is it possible that effluent from the Rail Equipment Maintenance Yard will contain radioactive materials? If so, is a septic tank an acceptable method for disposal?]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
51 40.	2.2.4.3.2/ p 2-107	Outsourced licensed facility for cask maintenance.	It is recommended that DOE consult with Nye County regarding the establishment of a cask repair facility and the need to locate such a facility "elsewhere" in the United States. If a repair and maintenance facility is required, it should be located adjacent to the repository, possibly in the proposed Crater Flat industrial park. The logic of this recommendation is contained on page 2-107.]
52 41.	2.2.4.3.3/p 2-108	Railroad control and operations.	It would be appreciated if DOE would note the developing, mutually beneficial, coordinated communications and emergency response activities between DOE and the Nye County government. It is anticipated that as this cooperative relationship expands, the logic of locating the railroad control center and similar facilities in one location adjacent to the repository will become obvious.]
53 42.	2.2.6.2.2/ p 2-112	Shared use facilities.	As noted in this EIS and by other studies, the shared use of this rail road is important and the usage appears to be significant. As plans go forward with regard to rail design and the location of rail facilities, it will be extremely important for DOE to work in conjunction with Nye County in planning and designing the railroad to accommodate shared use.]
54 43.	2.3/p 2-114	If neither the Caliente or Mina corridor were not selected ...	The No Action scenario presented in this document is incomplete. The obvious alternatives involve the other proposed rail corridors and/or truck transportation. Congress mandated that the Yucca Mountain repository be constructed. Hence, the 'no action' alternative must involve transportation of some type. Nye County recommends that DOE work cooperatively with Nye and the AULGs to identify issues associated with the obvious alternatives.]
55 44.	2.4/ p 2-114	DOE Preferred alternative.	Nye County is particularly pleased that a rail transportation alternative and the shared use option is preferred. These decisions are consistent with Nye County policy and needs.]

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56 45.	Table 2-31	The environmental and socioeconomic impacts of trucking are not discussed in this evaluation.	<p>Recognizing that this is a rail corridor EIS, Nye County must reiterate our concern about the projected increase in truck traffic that will accompany construction and operation of the repository. It is our opinion that an increase in such traffic is an unacceptable adverse impact on our community and no mitigation measures have been identified. Increased truck traffic will degrade aesthetic resources, degrade air quality, increase noise and vibration, and increase highway accidents and injury. The economic benefits of increased truck traffic are minimal compared to the projected benefits of rail.</p> <p>DOE should examine the upgrading of local highways and the construction of by-pass highways to avoid populated areas. Such populated areas include Tonopah, Beatty, and Pahrump. An adequate highway south of Pahrump does not exist. Consideration should be given to construction of a paved highway south of Pahrump and a Pahrump by-pass highway. This new work would avoid truck transportation difficulties that currently exist.]</p>
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57 46.	3.2.9.1/ p 3-279	Construction and operations workers are assumed to reside 80 percent in Clark County.	Historical residency patterns are not applicable and are incorrectly used in this presentation. It is illogical to expect DOE employees and contractors to travel 100 miles or more one-way to work each day. Most workers would find this arrangement unacceptable. Nye County recommends that DOE work with Nye County to plan and develop ways to incentivize business and employees to locate in Nye County.]
58 47.	3.2.10.1.2/p 3-300	Region of influence is projected to be 0.5 miles from the rail alignment and for accidents or sabotage, within 50 miles.	This seems like an extremely conservative (large) area to use in the evaluation. Is there technical justification for these distances?]

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59 48	3.2.12.4/p 3-316	low-level radioactive waste would be disposed "... in a DOE low-level waste disposal site, a site in an Agreement State, or in an NRC-licensed site."	This should be clarified by changing to "either a DOE low-level waste disposal site or in a site licensed under NRC regulations." Sites in Agreement States still have to meet NRC regulations. Similar wording should also be revised in Section 3.2.12.1 on page 3-315; Section 3.3.12.4, page 3-673; Section 4.2.12.3.3, page 4-348; and Section 4.3.12.3.3, page 4-715.]
Vol III			
60 49.	4.1.1/p 4-2	No-action impacts.	As noted above in comments 43 and 45, the 'no-action' alternatives must include the other proposed rail corridors and truck transportation. The description provided on Page 4-2 is inconsistent with Congressional dictate.]
61 50.	4.2.1.2.1.3/p 4-12	After construction was complete, DOE would regrade...	Nye County will probably recommend that some areas be transferred to County ownership rather than be removed. Nye County recommends that DOE consult with Nye County on the future use of such facilities.]
62 51.	4.2.1.2.3.3/ p 4.28	Maintenance facilities.	It is recommended that DOE consider having a private operator perform the various maintenance described here. Such a facility could be located in the Crater Flat industrial park located outside the land withdrawal area. One advantage of such a location is that the workers would not have to be 'badged' thus facilitating daily operations.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
52	4.2.1.4/p 4-31	The Shared-Use Option would include the construction and operations activities described in Sections 4.2.1.2 and 4.2.1.3, and private companies would use the rail line for shipment of general freight. Under the Shared-Use Option, potential construction and operations impacts would be very similar to those identified in Sections 4.2.1.2 and 4.2.1.3 for the Proposed Action without shared use.	The Shared-Use Option would require the construction of more rail sidings within the rail line construction right-of-way in areas of relatively flat terrain. A commercial-use interchange facility at the beginning of the line and a facility at the termination point of commercial use to support the Shared-Use Option would also be constructed within the construction right-of-way. The analysis should identify the possibility of commercial rail facilities off the right-of-way, such as Crater Flat or to business parks in Lincoln County. These areas may have construction impacts on the physical setting too. Implementation of the Shared Use Option would increase the area of surface disturbance by less than 0.1 percent (see Chapter 2). There would be a potential for topsoil loss and increased erosion in this area. Under the Shared-Use Option, the rail line would likely be in use for more than 50 years, compared to the railroad operations life under the Proposed Action without shared use. Shared use of the proposed rail line would add no impacts to physical setting beyond the permanent alterations already described.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
64 53	4.2.2.2.3.2/p 4-44	Construction Impacts on BLM Grazing Allotments	<p>Construction through grazing allotments should proceed as rapidly as possible to limit disruption. Cattle access to food and water should be assured or ranchers should be financially compensated. Rail design should provide mitigation measures for cattle access to grazing areas, water, or compensation should be provided. Road crossings must be suitable for farm equipment and emergency response vehicles.</p> <p>The rail line could pose additional risk to ranching operations because livestock could be struck by passing trains. DOE or the commercial user (under the Shared-Use Option) would reimburse ranchers for such losses, as appropriate. Are freight rail companies obligated to commit to mitigation such as this? Aren't there safety measures that could be included to this possibility? It seems that this might be too much of a commitment to ask of a rail operator. The rail line could intersect existing fences on active grazing allotments. The BLM and DOE would review with the affected allotment permittees the need to restore fences.]</p>
65 54	4.2.2.3/p 4-59	Operations Impacts	<p>Nevada is an open-range state, where it is the responsibility of private landowners to fence their properties to prevent livestock from damaging their property and where ranchers could be compensated for the loss of their livestock killed by vehicles and trains. If DOE trains struck and killed livestock, DOE or the commercial carrier (under the Shared-Use Option) would reimburse ranchers for such losses, as appropriate. See comment above.</p>

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
66 55	4.2.2.4/p 4-60	Impacts under the Shared-Use Option	<p>Impacts to land use and ownership under the Shared-Use Option would be similar to those described for the Proposed Action without shared use, with a small addition of impacts from the construction and operation of commercial sidings. DOE cannot predict the exact locations of these possible commercial-use sidings, but they could include Caliente, Panaca/Bennett Pass, the Warm Springs Summit area, Tonopah, Goldfield, and the Beatty Wash/Oasis Valley area, and Crater Flat. The sidings would likely be constructed within the railroad operations right-of-way; if so, there would be no additional impacts to land use and ownership (see Figure 2-55). Because only approximately 1 percent of land within the rail line construction right-of-way is privately owned, any commercial sidings or commercial facilities that would be outside the construction right-of-way would likely be on BLM-administered land, and implemented under a separate BLM-issued right-of-way.</p> <p>Implementation of the Shared-Use Option could have future, long-term impacts on land use.]</p>
67 56.	4.2.3.2.1/p 4-82	DOE would consider requests from local government to leave portions of work camps to local governments for their use.	Nye County applauds this decision and requests that DOE involve local governments early in the decision making process regarding camp location and future use.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
68 57	4.2.5.4/p 4-148	Shared use option	<p>Construction impacts to surface-water resources under the Shared-Use Option would be similar to those identified for the Proposed Action without shared use. The Shared-Use Option would involve the construction of additional sidings, which would be approximately 300 meters (980 feet) long and would be aligned parallel to the rail line within the construction right-of-way. Construction of these additional sidings would involve the same types of land disturbance as for the Proposed Action without shared use, but with minor additive impacts.</p> <p>General freight shipped on the proposed rail line could include mineral products, petroleum, agricultural products, or other commodities shipped or received by private companies. Spills of oil or hazardous substances carried on the rail line as general freight could affect surface-water resources.]</p>

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
69 58.	4.2.6.2.1/p 4-161	DOE would decommission water wells according to State of Nevada standards.	Nye County requests that DOE involve Nye County in any decisions about the future use of water wells. Such wells could be beneficially used as ground-water monitoring locations or as a source of water for fire fighting. Nye County would be willing to assume ownership of wells deemed to have a future use.]
70 59	4.2.6.4/p 4-180	Impacts under the Shared-Use Option	Impacts to ground water under the Shared-Use Option would be similar to those identified for the Proposed Action without shared use. Under the Shared-Use Option, additional commercial rail sidings would be constructed as a third track alongside passing sidings (Figure 2-55). The total length of commercial rail sidings would be relatively small compared to the total length of the rail line. Therefore, under the Shared-Use Option, water needs for construction of the rail line would increase only by approximately 150,000 cubic meters (119 acre-feet).]
71 60	4.2.7.3/p 4-232	Impacts under the Shared-use option	The Shared-Use Option would require construction of commercial sidings. All such construction would be immediately adjacent to the DOE rail alignment and would have impacts similar to those under the Proposed Action without shared use. The Shared-Use Option would mean an increase in train traffic. Therefore, DOE would expect special status species, State of Nevada game species, and wild horse and burro interactions with train traffic (collisions, change in movement patterns, altered behavior, and nest abandonment) to be slightly higher than those interactions with rail traffic under the Proposed Action without shared use.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
72 61	4.2.8.4/ p4-260	Impacts under the Shared-use option	<p>The Shared-Use Option could result in increased train operations because DOE would allow commercial shippers to use the rail line. Such increased operations could result in increased noise impacts because DNL is a function of the number of train events per day. Increased train operations would not affect vibration impacts because vibration is evaluated on a maximum-level basis only.</p> <p>The typical train under the Shared-Use Option would consist of three to four locomotives and up to 60 railcars . The average length of a car would be 18 meters (60 feet) for a total length (railcars only) of 1,100 meters (3,600 feet). Trains would operate along the rail line at a top speed of 80 kilometers (50 miles) per hour. <u>As noted in subsequent sections of the document, train speed is stated as 40 mph. Thus, there is an inconsistency in the document that needs to be straightened out. We assumed a maximum design speed of 40 mph.</u></p>
73 62.	4.2.9.2.1/p 4-265	DOE assumes most construction workers would live in Clark County.	<p>It is important to note the population differences between Clark County and Nye County. The impact (assumed to be positive in this case) is significantly greater in Nye County because of the smaller population. Nye advocates that DOE should try to give workers in Nye County special consideration for employment during construction and operation of the railroad.]</p>
74 63.	4.2.9.2.3.1/p 4-273	NTS personnel could provide medical services for construction workers along common segment 6...	<p>The EIS should recognize the existing cooperative agreement between Nye County and the DOE in which Nye County agrees to provide emergency response services to the YMP. It is anticipated that this agreement will be expanded to include Nye services during the rail construction phase also. Such service could be provided along the entire corridor in Nye County and the arrangement would benefit both the DOE and Nye County.]</p>

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
75 64.	4.2.9.3.3.1/p 4-280	An increased demand on health-care system in Nye County is anticipated.	Nye County appreciates DOE's recognition that construction and operation will result in an increased demand on Nye's stressed health-care system. It is anticipated that Nye and DOE will agree to monitor this situation to identify if federal mitigation measures will be necessary. J
76 65.	4.2.9.3.3.2/ p 4-281	An increased demand on Nye County schools is anticipated.	Nye County appreciates DOE's recognition that construction and operation will result in an increased demand on Nye's stressed educational system. It is anticipated that Nye and DOE will agree to monitor this situation to identify if federal mitigation measures will be necessary. J
77 66.	4.2.9.3.3.3/p 4-281	An increased demand on Nye County fire protection services is anticipated.	Nye County appreciates DOE's recognition that construction and operation will result in an increased demand on Nye's stressed emergency response system. It is anticipated that the existing DOE/Nye County cooperative agreement for Public Safety Services will continue to grow as the demand for services expands. This cooperative relationship is viewed as benefiting both DOE and Nye County. J
78 67.	4.2.9.3.4.1/ p 4-281	Traffic impacts do not address increased truck traffic, especially if there is no rail service to the YMP.	Increased truck traffic, and commuting work force, is anticipated to cause a significant and worrisome adverse impact on the local community. Insufficient mitigation measures have been identified thus far. Nye County recommends that DOE (including NNSA) engage Nye County in a planning process that will identify the anticipated adverse impacts and what mitigation measures are necessary. J
79 68	4.2.9.4.1/p 4-283	Construction Impacts under the shared-use option	Sidings would be built at the locations convenient for the shippers. The document needs to recognize that there will be spurs at other locations than where sidings are planned. DOE must be willing to allow this to happen, or shippers will not want to use or may be precluded from using Nevada Rail. DOE must work cooperatively with Nye County and local shippers to define where sidings and spurs will be located. J

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
80 69.	4.2.9.4/p 4-283	Impacts under the Shared Use Option.	This EIS and studies conducted by Nye County identify a significant demand for rail access when the railroad is constructed. Nye County recommends that Nye County planners be involved in a cooperative effort with DOE planners and designers to assure that the positive impacts of the shared use of the railroad are fully recognized and integrated into the design and construction process.]
81 70	4.2.9.4.1.2/p4-283	Employment and Income. "There could be very limited increases in employment and income associated with construction under the Shared-Use Option. These increases would be similar to the changes in employment and income associated with construction under the Proposed Action without shared use. There could be limited loss of economic activity associated with land acquisition for the commercial-siding and parking-area rights-of-way, but DOE would expect such impacts, if any, to be small."	This discussion ignores the opportunities for local industries to provide materials/products for rail and repository facility construction and the economic benefits accrued to the local economies as a result.]
82 71	4.2.9.4.2.1/p 4-284	Population and housing. "It is not likely that there would be noticeable increases in population associated with railroad operations under the Shared-Use Option. Increases in economic activity and associated indicators, particularly in terms of employment, would likely be limited and therefore would not generate substantial changes in permanent population. Therefore, DOE would expect no impacts on housing under the Shared-Use Option."	If we are just talking about railroad operations employment, this is probably true enough. But if we are talking about employment at existing industries served and new businesses attracted to Nye because of the rail, it is not true. There will be a significant number of new workers under the Low Scenario, and even more so under the High Scenario, and these new workers will need housing.]
83 72	4.2.9.4.2.2/p 4-284	Employment and Income	The quantity of product potentially shipped by commercial rail in this corridor – even with-in the Low Scenario – would provide major employment and income benefits to Lincoln and Nye Counties as indicated in the Rail Transportation Economic Impact Evaluation and Planning Study (Nye County, November 2007). With a High Scenario, the study anticipates multiple commercial trains on the line.]

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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
84 73	4.2.9.4.2.4/p 4-285	Transportation infrastructure. This section states that delay impacts to road traffic at crossings would be small.	With commercial activity, there will be more employment. New employment means more employees driving over crossings, increasing potential for delays and potential accidents.]
85 74	4.2.10.2.2.1/ p 4-305	Radiation dose to workers is based on a 50 year exposure.	It is inconceivable that a worker would occupy the same job and receive the same exposure for a 50 year period. It is recommended that a more realistic scenario be used in this type of calculation. As noted in Section K.2.3, page K-7, this analysis assumes the regulatory maximum radiation dose of 10 millirem per hour is emitted from every transportation cask. This is highly conservative and should be noted along with a more realistic estimate using statistics from radiation rates from historical shipments of used nuclear fuel and high-level radioactive waste. Assumptions such as used in this calculation serve only to misinform the public by overestimating impacts. This comment applies to all estimates that use the regulatory maximum radiation rate as input.]
86 87 75	4.2.10.2.2.1/ p 4-305	estimates the maximally exposed worker would receive 25 rem because the same person would receive the administratively controlled maximum dose for 50 consecutive years.	This is ridiculous. No number should be cited for the maximally exposed worker for the lifetime of the project. It is enough to say doses will be limited administratively to no more than 500 millirem per year. Assumptions such as this serve only to provide misinformation to the public by overestimating impacts. This comment also applies to all instances where DOE assumed one person receives the maximum dose every year for the project duration such as Section 4.3.10.2.2.1, page 4-672 and 673.] Additionally, the Rail Alignment EIS discusses 50 years of transportation activities and the Rail Corridor SEIS discusses 34 years of transportation. The analyses should be consistent.]
88 76	4.2.10.2.2.2/p 4-310	The exposed population surrounding a cask maintenance facility is within an area 52 miles away from the facility and the population in this area is assumed to be exposed at the same level as the maximally exposed individual.	This assumption is inconceivable. It is recommended that a more realistic scenario be used in this type of calculation.]

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89	4.2.10.2.2.2/p 4-311 to 315	discuss consequences from severe accidents and sabotage involving transportation casks.	Based on the information in the Draft Appendix K and references, the consequences make very conservative assumptions regarding response to the sabotage or accident events. This should be noted in the text along with analytical results of more reasonable scenarios. For instance, estimates assuming evacuation within a few hours one half mile from the severe event would be more reasonable and should be included as a point of reference. Also, all releases should not be assumed to be respirable sized particles. Bounding analysis may be useful to DOE impact analysts, but is nothing more than misinformation to the public. This comment also applies to Section 4.3.10.2.2.2, pages 4-675 to 681. In addition, the exposure in this scenario would be an "acute" exposure.]
90	4.2.10.3.3.2/p 4-322	Nonradiological roadway accidents. Under Shared-Use Option operations, any increase beyond what is described under the Proposed Action for roadway accidents and fatalities would be minimal.	The High Scenario train operation, cited in the Nye County economic impact study, may increase this number. FRA/PUC safety measures should be included as mitigation. Impacts are considered to be the same as those identified for the Proposed Action.]
91	4.2.10.3.3.2/p 4-322	Nonradiological rail line accidents. This section says that the impacts of commercial rail traffic at crossings would be small.	A higher number of grade crossing accidents can be expected on the eastern end of the line due to the higher volume of traffic forecast there in the Nye County study.]
92	4.3.1.4/p 4-397	Impacts under the shared-use option -- Mina	Refer to comments made on the Caliente corridor above.]
93	4.3.8.3.2/p 4-607	Horn noise	It is requested that every effort be made to reduce or eliminate horn noise in areas where residents live within two miles of the track.]
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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
94	5.1.4/p 5-3	"to the extent the Proposed Action would contribute cumulatively to impacts to regional resources, or to other activities . . . DOE could take additional actions to reduce any identified impacts associated with its Proposed Action, as practicable (see Chapter 7)."	Nye County has a different view on cumulative impacts associated with a long history of Federal activities in our county. That view and our perspective on mitigation that DOE should undertake are incorporated in the Yucca Mountain Repository Draft SEIS and should be incorporated in this Rail Alignment EIS, as well. This comment also applies to Section 5.2.2.9, page5-38; and Section 5.3.2.9, page 5-75.]
95	5.2.1.3.5/p 5-8	Other regional economic development	In this section, there needs to be recognition of a potential Crater Flat development, which may spur economic development in Nye County.]
96	5.2.2.1.1/p 5-19	Disturbance of physical resources	In this section, as in others above, there needs to be the recognition that shippers may want spurs in locations outside of the ROW, and DOE needs to allow for this.]
97	5.2.2.2.1/p 5-20	Land use changes	There needs to be mention of Crater Flat, and the change in ownership of land from BLM to Nye County to facilitate development.]
98	5.2.2.2.4/p 5-20	BLM land sales and other disposals	There needs to be mention of Crater Flat, and the change in ownership of land from BLM to Nye County to facilitate development.]

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3. Document Title: Draft Supplemental Environmental Impact Statement ... DOE/EIS-0250F-S2D and Draft Environmental Impact Statement ... DOE/EIS-0369D			
4. Document No. /Rev: DOE/EIS-0250F-S2D and DOE/EIS-0369D		5. Date: October 2007	
6. Reviewer Name: Nye County NWRPO		7. Organization: Nye County Nuclear Waste Repository Project Office	
8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
99 100 101	87 5.2.2.9/p 5-36	Socioeconomics	<p>Under the discussion of the Shared Use Option on page 5-37, there needs to be mention of a potential Crater Flat development, which will trigger new employment.]</p> <p>[Also, toward the end of this discussion on page 5-39, we should point out that in case of any temporary disruption of rail service, SNF shipments may have to travel by existing roadways to the Repository. No plan is proposed for this. DOE should coordinate with the State of Nevada and local jurisdictions to come up with a plan for this contingency.]</p> <p>[The final paragraph of this section needs to be refuted. The project, on the high side, would indeed create a large impact on economic development and growth. The document says that the socioeconomic impact would be small.]</p>
102	88. 5.2.2.10.2/ p 5-41	discusses cumulative impacts and tries to compare radiological doses associated with use of the Caliente rail alignment to radiological doses to the public from repository construction and operations.	<p>This is inappropriate since the doses would be to different people. This section goes on to say that estimated dose to the maximally exposed member of the public from NTS operations receives 2.3 millirem and that the NTS dose would be a very small contribution of overall radiological impacts from a repository. The repository maximum annual dose to a member of the public is 6.8 millirem which comes 99.9 % from naturally occurring radon released from excavation activities, so the stated relationship is not valid. The Rail Alignment EIS should only say radiological impacts from the Proposed Action would be small without implying that impacts from a repository would be large. In fact the impacts from a repository would also be small and come almost entirely from naturally occurring sources, not from nuclear waste. This comment also applies to Section 5.3.2.10.2, page 5-79 in relation to the Mina corridor.]</p>

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3. Document Title:
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6. Reviewer Name: Nye County NWRPO	7. Organization: Nye County Nuclear Waste Repository Project Office
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8. Number	9. Sec/Para/Pg	10. COMMENT	11. SUGGESTED RESOLUTION
103 89.	5.3.7/p 5-42	The section references the socioeconomic impact resulting from development of the Jean corridor.	The section does not reference possible benefits from including a road in the right of way for vehicular traffic which would allow traffic to and from Nye County (and communities between Jean and Nye County) without having to take the longer route through Las Vegas. Presence of the right of way would also provide a possible route to Pahrump for a natural gas pipeline, which would beneficially impact the development of the Pahrump and intervening communities.]
104 105 90	Table 5-4/p 5-58		<p>There needs to be a clear mention of new economic activity triggered by commercial use of Nevada Rail. It is not clear DOE is counting new shipper employment. Rather, DOE may just be counting construction, repository and railroad employment.]</p> <p>[Table 5-4, says combined repository and Nevada railroad impacts related to health and safety are "Not applicable." The sum of the impacts should be included in this table, even if the sum is the same as the impacts estimated for the repository only.]</p>
106 91	K.2.5/p K-47	says input assumptions for transportation accidents include that all material released would be aerosolized and respirable and that there would be no interdiction or cleanup for 1 year.	These assumptions are unreasonable for any significant release and should be replaced with more reasonable assumptions for severe accidents and sabotage estimates. This comment also applies to Section K.2.6, page K-51.]