



# United States Department of the Interior

NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
655 Parfet Street  
P.O. Box 25287  
Denver, Colorado 80225

WM DOCKET CONTROL CENTER

IN REPLY REFER TO:

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L7619 (RMR-MR)

APR 4 1984

Mr. Robert E. Browning  
Director  
Division of Waste Management  
Nuclear Regulatory Commission  
1717 H Street, NW  
Washington, D.C. 20555

WM Record File	WM Project
<u>106.1</u>	<u>16</u>
	Docket No. _____
	PDR <input checked="" type="checkbox"/>
	LPDR <input checked="" type="checkbox"/>
Distribution: REB	CR WKerr
MTB	DM JLinehan
JOB	HM RJohnson
(Return to WM, 623-SS)	JSS

Dear Mr. Browning:

At the request of Mr. John Linehan of the Commission Staff on Salt Repositories in Columbus, Ohio last week, we are addressing the concerns and issues of the National Park Service relative to the possible development of either the Davis or Lavender Canyon sites in the Paradox Basin of Utah.

The National Park Service is charged by the Congress under its 1916 Organic Act "\* \* \* to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." In the enabling legislation for Canyonlands National Park in 1964, Congress further stated that the purpose of the park was "\* \* \* to preserve an area in the State of Utah possessing superlative scenic, scientific, and archeological features for the inspiration, benefit, and use of the public." Under the two above Public Laws, we feel very concerned that the following issues and concerns be addressed fully and adequately to our satisfaction prior to any further development of either site near the boundary of Canyonlands National Park.

1. Air Quality Protection--The pristine conditions of this national park are such that any action causing air pollution will be a degradation upon the visitor's experience. This would include:

- a. Visibility
- b. Night sky brightness
- c. PSD National Ambient Air Quality Standards

2. Noise Protection--Basically only nature (wind blowing through trees and shrubs, insects, birds, and other animals) changes the exceptionally low noise levels; with minor, short duration intrusions of automobiles and human generated sound. This should include any impacts as the result of use of explosives for blasting or accidental damage to the cache of explosives in the compound.

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3. Geohydrology Protection--There is already some data available upon aquifer underlying the proposed sites and park. The National Park Service is concerned that protection will be given water resources of the park that aquifer disruption will not occur; that mapped springs and seeps in the controlled zone will not be interfered with; and that surface waters that enter the park will not have increased pollution and sedimentation.

4. Park Visitor Protection--The park visitor entering into and partaking of the varied park experiences be given adequate protection by:

a. Lessening any possible disruption of their experience in visiting the park.

b. Preventing harassment by the projected increased nonpark traffic utilizing the entrance road, that was designed and designated for recreational use only.

c. Provisions for their safety in the event of an emergency. (Many of the visitors are away from radio communications and in the backcountry away from roads.)

5. Cultural Resource Protection--Both prehistoric and historic use of the area has been widespread and diversified.

6. Flora and Fauna Protection--Not only to specific species (threatened and endangered included), but the entire ecosystem needs protection from use and abuse.

7. Geologic Dissolution--Recent activities have been witnessed within the past 2-40 years have been identified within 10-11 miles from the proposed sites.

8. The controlled area for either site needs more definitive description for the National Park Service to better address issues. Is it, or will it be, within designated park boundaries?

8a. No exploratory drilling will be allowed within the Canyonlands National Park boundaries regardless of controlled zone definition.

9. No off-road access or seismic testing will be permitted within the park boundaries for definition of subsurface structure or related activities. Any Department of Energy or contractor activities within the park will require a permit issued by the park Superintendent.

10. Secondary Effects--We are concerned about what could occur as a result of:

a. Uncontrolled off-duty workers and their effect on the total environment.

- (1) Poaching, plinking, pot-hunting
- (2) Off-road vehicle use
- (3) Wildlife/plant life harassment or destruction

b. Residential impacts upon Arches National Park should the majority of the project workforce, and support Service personnel, choose Moab as a housing area.

- (1) Increased wood burning stove pollution
- (2) Vehicle traffic increases
- (3) Increased, unprogrammed visitation.

Basic data we have been able to glean from past documents and ONWI published material is based upon preliminary, inadequate or assumed data.

We hope that you will take the National Park Service's concerns into full consideration when you review the Department of Energy's draft and final environmental assessment to the final siting selections.

If we can be of any further assistance in the matter, please feel free to contact either Dick Strait (234-2775) or Cecil Lewis (234-6171) of my staff.

Sincerely,

*Lorraine Mintzmyer*  
L. Lorraine Mintzmyer  
Regional Director  
Rocky Mountain Region