ARCHES NATL. PARK by Karen Vendell

SIERRA CLUB Utah Chapter

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John Linehan
U.S. Nuclear Regulatory Commission
Division of Waste Management
Mail Stop 623-SS
Washington, DC 20555

Dear Mr. Linehan:

Last month when Tony Ruckel, Peter Huntoon, and I met with you and Scott Grace and several other NRC people, you asked me to send you some information on effects of site characterization on Canyonlands National Park. The following information is a partial response to that request.

I. Air Quality

Results of Bechtel air quality monitoring, according to Bechtel air quality engineer Joel Reisman (Deseret News, 1/21/84), show that "site preparation before an immense exploratory shaft is drilled would stir up enough dust to violate Class I air quality rules at Canyonlands National Park." Reisman said, "We are predicting some substantial numbers." In a situation during which the air is still enough that a dust plume hangs together without dispersing, site preparation would add 312 micrograms per cubic meter of dust to Canyonlands. Class I standards allow only an additional 10 (ten) micrograms per cubic meter. Visitors to the National Park would be able to see a plume of pollution from the diesel engines used to drill the exploratory shaft, which would be drilled with a 3,000- to 4,000-hp rig. Construction would take 8 to 9 months. DOE's own preliminary work indicates that site characterization activities would violate national ambient air quality standards inside the Park.

In addition, visibility at the National Park would be

affected. Don Gillespie, Assistant Regional Director of the National Park Service, said, "Our enabling act indicates that no degredation (sic) at all is acceptable. . . .Our charge is to leave the aspects of the National Park System unimpaired for the enjoyment of future generations." Gillespie could not say that even a small amount of pollution would be acceptable or allowable.

II. Archaeology

The Utah State Division of History predicts that as many as 1,000 archaeological sites may lie within the project's impact area, and over half of them may well qualify for National Registry listing.

Archaeologists Owen Severance and Steven Manning charge (Deseret News, 1/21/84) that the findings of the DOE-commissioned survey by Nickens and Associates contain "glaring oversights and errors." Nickens archaeologists "missed numerous archaeological sites and erroneously recorded locations for others." Severance recommended that the entire area be resurveyed.

Federal law requires a 100% survey of the affected areas, but the Nickens & Associates report deals with only about 10% of the impacted area. The thoroughness of DOE's study of the effects of site characterization on cultural resources in the Canyonlands area was also questioned by Utah State Archaeologist David Madsen, who has pointed out that studies by his office indicate an average of 25 to 50 archaeological sites per square mile in the Canyonlands region. The State has documented at least two archaeological sites which were damaged or destroyed as a result of DOE pre-site characterization activities, a clear violation of federal law. Site characterization activities in the area would have irreversible, permanently adverse effects on cultural sites in the National Park.

III. Noise

One of the most significant, impressive, and important values of Canyonlands National Park is the immense quiet which surrounds the visitor. In 1980, visitors in the remote backcountry of Canyonlands complained to the Park Service about constant, disturbing noise from a single DOE drill rig 12 miles distant. Site characterization activities such as blasting two 20-30' wide and 3000' deep mine shafts, extensive drilling of at least 800 boreholes, excavating hundreds of thousands of cubic feet of rock and salt, constant operation of diesel generators, seismic work involving drilling and explosives, new road construction, and constant truck traffic would destroy this experience.

IV. Visual impacts

The visual intrusion of extensive night lighting of the site characterization facilities, security areas, and transportation routes would have serious impacts on the remarkable darkness of the night sky and the visibility of the stars in this area where the unusual lack of artificial light contributes significantly to the visitor's sense of remoteness, solitude, and wilderness. The visual impacts related to the excavation and storage of hundreds of thousands of cubic feet of salt and rock, mining equipment, drill rigs, 225' high headframes over the mine shafts, constant truck traffic throughout the entire characterization period, bulldozers and cranes, all literally on the boundary of Canyonlands National Park--and, according to DOE, even drilling inside the Park--would degrade the visual experience of Park visitors.

V. The visitor experience

Canyonlands is a remote, wild, desert National Park. People go there for a truly unique National Park experience, characterized by immense quiet, solitude, vast open spaces, spectacular desert scenery, hundred-mile views, wilderness, and lack of development. Visitors come here to experience these special qualities, away from crowds, noise, and development. Site characterization activities would destroy such experience.

VI. Geology, geohydrology, water

DOE has drilled one borehole in the vicinity of the sites, 1/2 mile from Davis Canyon. Existing geological data indicate that a number of faults and dissolution features exist within a seven mile radius of this single borehole. Further drilling, probably even within the Park, would clearly have seriously adverse effects on Canyonlands. Site characterization would involve mining a large quantity of salt on the very boundary of Canyonlands National Park, with impacts on the Park resulting from that mining, surface storage, windblown salt, flooding, and transportation of salt from the site. Uncontained salt would contaminat groundwater supplies and increase the salinity of the already too-saline Colorado River.

VII. Transportation

Access routes for site characterization would be along SR-191 and SR-211. SR-211, according to the Utah Department of Transportation, was constructed as a light traffic access road to a recreation area (Canyonlands). At present, SR-211 handles about 45

vehicles per day, with an average of one light truck per day. DOE projections show that the exploratory shaft construction phase would increase the traffic flow to 340 commuter and 28 truck trips per day along this route used by visitors to this remote, isolated national park where they seek solitude and quiet.

VIII. Plant and animal life

Site characterization activities, including hundreds of additional people in the area, air pollution, salt, and noise, would have serious impacts on wildlife, habitat, and vegetation in the National Park--from loss of peregrine falcon nesting habitat to destruction of vegetative cover by salinity and offroad vehicle activity.

I hope these comments will be helpful to you in understanding some of the impacts of site characterization on Canyonlands National Park. If you have any questions at all, please don't hesitate to call me (801-533-9384 (day) or 801-581-3886 (evening)) or Terri Martin of the National Parks and Conservation Association (801-532-4796)

Sincerely,

Ruth A. Frear

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