Holtec-CISFEISCEm Resource

From: Myrriah Gomez <myrriahg@hotmail.com>
Sent: Tuesday, July 31, 2018 12:32 AM
To: Holtec-CISFEIS Resource
Subject: [External_Sender] Docket ID NRC–2018–0052; Holtec International's HI–STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico

Dear, Nuclear Regulatory Commission Staff:

As a stakeholder in the application for the Consolidated "Interim" Storage Facility (CISF) for high level nuclear waste, I am writing to urge the NRC to reject the proposed plan. My name is Myrriah Gómez. I am a professor at the University of New Mexico. My forthcoming book examines the effects of the nuclear industry on people of color in New Mexico. I am writing as professor and researcher, but also as a lifelong resident of New Mexico, born and raised in El Rancho, New Mexico in the Pojoaque Valley, just 20 minutes from Los Alamos, where Site Y of the Manhattan Project colonized the Pajarito Plateau in 1942, beginning the nuclear legacy that the Holtec International Hi-STORE CIS Facility continues. I am writing today to OPPOSE the Holtec facility in southern New Mexico on the grounds on environmental racism. On November 5, 2003, the Nuclear Regulatory Commission issued a draft policy statement on the treatment of environmental justice matters in NRC regulatory and licensing actions. The final policy statement was issued to uphold the requirements of the National Environmental Policy Act (NEPA). According to Robert Bullard, environmental discrimination is defined "as disparate treatment of a group or community based on race, class, or some other distinguishing characteristic."

Many people argue that New Mexico is a sacrifice zone to the nuclear industry. I do not believe that it is. In order to be a sacrifice zone, the State must give up something it values for the sake of something more important. The U.S. has never valued New Mexico or its indigenous and native residents. From Los Alamos to Trinity to Church Rock to Laguna Pueblo to Gasbuggy to WIPP, we are an occupied place, where accidents and incidents have significantly injured, especially, people of color. When you draft the EIS documents, I urger you to consider the evaluation of the cumulative impacts of the legacy of the nuclear industry in New Mexico. Our environment has been destroyed and New Mexicans have been made targets of environmental racism. The proposed Holtec site is a multinational corporation with offices in Ukraine, Africa, Asia, and Arabia. The built environment of New Mexico is a vulnerable location for this projec, tasked with taking in the nation's high-level nuclear waste.

I have read the 543-page proposal, and it contains holes and problematic ideas, ranging from cask dangers and reprocessing dangers to lack of emergency management plans. While some people support this project for the proposed jobs the site will bring to a select few people, I recognize the capitalist endeavors motivating those positions, whereas safety and environmental impact has become an afterthought for those same supporters.

In Eddy County, 44% of the population identifies as Hispanic, and 3% identify as African American and American Indian. In Lea County, 40% of the population identifies as Hispanic and 5% is comprised of African American and American Indian. This proposal poses threats of environmetnal racism, and I urge the NRC to act in the interest of environmentaljustice.

Do not approve and advance this project-- the safety and environmental threats and consequences outweigh the economic concerns.

Sincerely,
Myrriah Gómez

Federal Register Notice: 83FR13802
Comment Number: 3546

Mail Envelope Properties (MWHPR16MB0013D2C00A8F62AA24E2F592DC2E0)

Subject: [External_Sender] Docket ID NRC–2018–0052; Holtec International's HI–STORE CIS Facility for Spent Nuclear Fuel, Lea County, New Mexico
Sent Date: 7/31/2018 12:32:28 AM
Received Date: 7/31/2018 12:32:52 AM
From: Myrriah Gomez

Created By: myrriahg@hotmail.com

Recipients:

Post Office: MWHPR16MB0013.namprd16.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3308	7/31/2018 12:32:52 AM

Options
Priority: Standard
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