



New Mexico Cattle Growers' Association

2231 RIO GRANDE BLVD. N.W. • ALBUQUERQUE, NM 87104

Mailing Address: P.O. Box 7517 • Albuquerque, NM 87194

PHONE (505) 247-0584 • FAX (505) 842-1766 • E-MAIL: nmcga@nmagriculture.org

WEB SITE: www.nmagriculture.org

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Dear Elected Official,

We are writing to express our continued concern with Holtec International's application to the U.S. Nuclear Regulatory Commission (NRC) requesting authorization to construct and operate a HI-STORE consolidated interim storage facility (CISF) for spent nuclear fuel at a site in Lea County, New Mexico. On behalf of the membership of the New Mexico Cattle Growers' Association (NMCGA), with members in all 33 of the state's counties as well as 19 other states, we appreciate the opportunity to write to you with our concerns. NMCGA believes that a nuclear waste storage would have unknown impacts on agricultural production, the primary economic engine for the surrounding area of the proposed site. Eddy and Lea County alone is home to 1,062 producers. According to the 2017 USDA, National Agricultural Statistics Service Census of Agriculture the counties combined produced and sold \$289,520,000.00 of agricultural products. NMCGA also has concerns for the local communities' safety and the negative perception associated with a nuclear waste storage facility being located within their counties and communities. Eddy and Lea Counties are steeped in strong agricultural roots and ranching traditions.

We understand that the process for selection of a location for the proposed nuclear waste disposal facility began in March of 2006. We understand that the formation of ELEA may be seen as the counties and local communities consent for the proposed project. However, we have concerns that the Bureau of Land Management (BLM) and New Mexico State Land lessees have not been continuously informed and that their input has not been considered. They will be directly affected as their land surrounds the project and the proposed project will need to build a new access road and a new railroad spur that will need to cross BLM land. This will likely impact the lessees of these lands, not only will land be taken away for the construction of the road and railroad spur, but in the construction land will be disturbed and trampled. And with the development of COVID-19 it has become even more imperative that agriculture land stays in production to keep New Mexicans fed.

RANDELL MAJOR, President, Magdalena; **LOREN PATTERSON**, President-Elect, Corona; **ROY FARR**, Vice-President At Large, Datil;
DUSTIN JOHNSON, NW Vice-President, Farmington; **JEFF DECKER**, SE Vice-President, Lovington;
CLIFF COPELAND, NE Vice-President, Nara Visa; **SHACEY SULLIVAN**, Secretary-Treasurer, Bosque Farms; **TOM SIDWELL**, Past President, Quay;
PAT BOONE, Past-President, Elida; **MICHELLE FROST-MAYNARD** Interim Executive Director, Albuquerque

We understand that outreach and education in the local communities has been pursued by ELEA in conjunction with Holtec International, however it has recently come to our attention that nine New Mexico state Senators and 21 New Mexico state Representatives have expressed their concerns to the NRC. Their primary concerns deal with health, safety, financial and transportation risks to the state of New Mexico and our communities. There seems to be building controversy over the proposed project despite ELEA's assertion that there is strong community support.

Safe or not the perception of living and working next to a nuclear waste site is negative. Who would want to live or work next to a nuclear waste site? Just because only nine people are estimated to live in a 5 mile radius doesn't mean that this nuclear waste disposal site won't impact these people's lives significantly. There is already a similar waste disposal site within 16 miles of the proposed site. However, WIPP was shut down in 2014 due to a radioactive leak and only reopened in 2017. Despite best efforts and ensured safety the local community will be reminded due to WIPP that no waste disposal site can absolutely guarantee that leaks and other safety concerns won't happen. This creates a stigma for the area and greatly affect local producers and land owners. An example of the Gold King Mine spill comes to mind, despite being reassured by the federal government of the safety of the water and crops/livestock that were potentially exposed to the water, entire communities would not consume or purchase these crops/livestock. Despite the passing of three years communities and consumers are still wary of those affected by the Gold King Mine spill. We are greatly concerned that the local community and producers will suffer due to the stigma of a nuclear waste disposal site.

We are greatly concerned that the state as a whole, as well as the local communities, is unaware of the safety concerns regarding transportation of the spent nuclear fuel to the proposed site as New Mexico does not keep records of hazardous materials transported to or from our state. If there is no records of the shipments via roadways or rail and there is no record of what specific types or quantities of hazardous materials, where is the reassurance and proof that our citizens and communities will be safe without any records indicating the safety or even the shipment of previously transported hazardous material.

This Facility would necessitate shipping of high-level radioactive waste along railways and roads throughout our state. Our current roads and railways were not built to withstand the weight of waste containers and there are no plans for construction or renovations within this proposal. Residents across New Mexico, as well as the state itself, would be asked to endure the cost of the infrastructure enhancements needed for safe transportation, as well as for the emergency response personnel and equipment that will be needed to respond to an incident. The department of Energy's (DOE) modeling of rail transportation of waste to Yucca Mountain predicted accidents at a rate 1 in 10,000 shipments, meaning it is essential that such measures be put in place.

We thank you for the opportunity to write to you and have our concerns addressed. NMCGA would like assurances that every effort is being made to inform those directly involved by the Holtec International HI-STORE CIS project including the BLM and State land lessees and the surrounding communities. Not only should these individuals be informed, but their input should be considered. The surrounding lessees and communities are the ones that are going to be directly affected not only by the stigma of a nuclear waste site but by the construction and operation of the project, their concerns need to be heard and considered.

If you or your offices have any questions please don't hesitate to call our offices at 505-247-0584 or email us at nmwwgi@nmagriculture.org.

Sincerely,

Randell Major

Randell Major, President