

Reviewed by R. Schmitt Date 4/29/77

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Jan. 4, 1974

COMMENTS ON HN-3156.1.1 - WORKING DRAFT, ENVIRONMENTAL IMPACT  
STATEMENT FOR A CLEANUP PLAN- OCT. 5, 1973 - NM OGLEP

In general, the above mentioned draft is an excellent and complete piece of work. However, as a reviewer of the draft I take my function to be to point out any places where the work may be questioned in later review. Thus it should be clear that the following comments are intended to be helpful.

There are a great number of "nitpick" comments that I have not felt worth noting here. For those I have simply annotated a copy of the draft for the use of H&N. However, some more substantive comments follow.

1. The basic philosophy that even requires such a statement is to me somewhat odd. Clearly the intent of the proposed action is to put human welfare above environmental detriment by moving the natives back. However, we don't even own the land, it belongs to the natives. Thus it seems to me somewhat improper for the United States to be judging the impact. However, since the US is putting up the money the reasoning is clear. But the impact judgement by others should take this into account. Perhaps some such point should be made in the report?

2. In innumerable instances the report states as beneficial some action because it will help the native situation. As I see it, the question is effect on the environment, not on man. Thus I question the use of this attitude in the report. Presumably, any thing we do at Enewetak atoll is worse environmentally than leaving it alone?

3. In the same vein, the impact statement gives the impression of being written by someone who wishes the proposed action to take place, the effects on plants and animals are played down, the benefits to the natives are emphasized. There is very little debate to show that the proposed method of resettlement produces the least possible effect on the environment. (I repeat that I personally consider the whole question silly).

4. On Page 1-4- Assignment of responsibilities- should the rights or responsibilities of the natives be mentioned?

5. Page 3-7 - Map-The map uses the US code names, while the text usually uses the native names. Should the map also show native names? Perhaps the map should also show the destroyed islands.

6. Page 5-20 and elsewhere- Why doesn't the camp size vary with the plan picked, ie, the magnitude of the job? Should this be explained in the statement?

7. Page 5-33 - Should the cost summaries also include re-settlement costs? I realize these may not be known at this time.

8. Page 6-13- Are the access channels really necessary? I believe the original construction only required the removal of some coral heads.

9. Section 7-Are there alternate resettlement plans? Could different resettlement plans reduce the environmental impact?

10. Page 8-2. I find numerous points in this table in which the statement is made that the action listed will have no environmental impact, but it seems to me that it will. This

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is perhaps an example of (5) above.

11. I find nowhere a discussion of the expected effects on the people from radiation or other manmade hazards were they put back on the islands with no cleanup. How many cases of cancer or leukemia or broken legs would one have in how much time? It seems to me that these guesses are necessary if one is to balance the environmental impact against the benefit. Perhaps the AEC is going to furnish this?

12. I suggest that in many places in the statement it would be better to simply give the impact without offering judgement as to whether that impact is good or bad.

*W - Opl*