

**Joseph L. Herrera**  
Governor



**Salvador G. Romero**  
Lt. Governor

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Cochiti Pueblo, NM 87072-0255  
PH# (505) 465-2244 FAX# (505) 465-1135

May 21, 2021

**VIA EMAIL**

Attn: NEPA Compliance Officer  
United States Department of Energy  
Los Alamos Field Office  
3747 West Jemez Road  
Los Alamos, NM 87544

**Re: Pueblo de Cochiti Scoping Comments on the Electrical Power Capacity Upgrade Project Environmental Assessment**

The Pueblo de Cochiti (“Pueblo”), submits the following comments in response to the proposed Electrical Power Capacity Upgrade (“EPCU”) Project Environmental Assessment issued on April 21, 2021, that will evaluate the potential environmental impacts of the National Nuclear Security Administration (“NNSA”) proposal to construct, operate, and maintain an approximately 12.5-mile, 115-Kilovolt power transmission line erected on public lands within Santa Fe County. The proposed transmission line would be erected in the Caja Del Rio area of Santa Fe County and span White Rock Canyon onto the Department of Energy and NNSA-managed lands at Los Alamos National Laboratory (“LANL”) within Los Alamos County.

Since time immemorial, our people have occupied and ecologically stewarded extensive areas of New Mexico including the area now known as the Caja Del Rio plateau. Our ancestors migration, our continuous occupation and religious use of the Caja Del Rio Plateau have created an interwoven way of life spanning thousands of years that includes Traditional Cultural Properties (TCPs), cultural resources and sacred sites. Cochiti also continues its engagement addressing concerns and disputes related to the unresolved historic reacquisition (purchase) of the Spanish land grant known as the La Majada which is recognized by Spanish law as ancestral territory of Cochiti Pueblo.

Our Pueblo maintains histories of interactions with this landscape and the gifts considered by our Pueblo to be both cultural and natural resources—plants, animals, air, soil, and water. Our Pueblo and many others actively maintain cultural connection to the Caja del Rio area for a variety of purposes including hunting, medicinal needs, traditional cultural practices, and other ceremonial purposes. Maintenance and protection of the ecological and spiritual relationships between our Pueblo and the resources this cultural landscape holds is central to the longevity of our identity as Cochiti Pueblo people. The protection of this area’s natural resources, traditional

cultural properties, and sacred sites is necessary to our Pueblo's cultural preservation now and into the future. Even those outside of our Pueblo, including those within the field of archaeology recognize this area's importance in telling the story of our Pueblo people.

Despite the Caja Del Rio's recognition as a sacred landscape for the Pueblos and its richness in cultural resources, this landscape and its resources continues to suffer mismanagement resulting in ongoing impacts including the vandalism of sacred sites, illegal dumping, poaching, unregulated shooting, and off-road misuse. This has necessitated our Pueblo's ongoing engagement in the protection of this precious landscape that holds resources critical to our cultural well-being including, but not limited to, numerous petroglyphs, the pinon-juniper savanna, water tributaries of the Rio Grande, and vital wildlife habitat including the gray fox, badger, burrowing owls, mountain plover, long-billed curlew, spotted bats, and the threatened gray vireo. Many of these cultural resources and sacred sites in this landscape are not documented and thus remain unprotected.

The Santa Fe National Forest is still finalizing its updated management plan, and several of the alternatives the agency is considering include Wilderness recommendations on Caja del Rio. It would be disheartening for the Forest Service to move forward with the proposed EPCU project and exclude potential Wilderness designations. At this time the Pueblo urges the NNSA to prepare a full Environmental Impact Statement, meaningfully consult with the Pueblos in determining the scope of natural and cultural resource impacts, gather requisite baseline cultural resource information, and take a hard look at potential impacts on those cultural resources according to the National Environmental Policy Act, National Historic Preservation Act, and the Federal Land Policy and Management Act.

Respectfully,

  
Governor Joseph L. Herrera  
Pueblo de Cochiti



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building  
1190 Saint Francis Drive, PO Box 5469  
Santa Fe, NM 87502-5469  
Telephone (505) 827-2855  
[www.env.nm.gov](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

September 10, 2020

Ms. Fana Gebeyehu-Houston  
NEPA Document Manager  
National Nuclear Security Administration  
Livermore Field Office  
7000 East Avenue, L-293  
Livermore, CA 94550-9234

Submitted electronically to: [LLNLSWEIS@NNSA.DOE.GOV](mailto:LLNLSWEIS@NNSA.DOE.GOV)

RE: Notice of Intent To Prepare a Site-Wide Environmental Impact Statement for Continued Operation of the Lawrence Livermore National Laboratory

Dear Ms. Gebeyehu-Houston,

On behalf of the New Mexico Environment Department (NMED), attached please find our comments on the August 5, 2020 Notice of Intent To Prepare a Site-Wide Environmental Impact Statement for Continued Operation of the Lawrence Livermore National Laboratory.

Please do not hesitate to contact me to discuss further.

Sincerely,

James C. Kenney  
Cabinet Secretary

Attachment (1)

cc: Courtney Kerster, Director of Federal Affairs, Office of Governor Michelle Lujan Grisham  
Sandra Ely, Director, NMED Environmental Protection Division  
Rebecca Roose, Director, NMED Water Protection Division  
Stephane Stringer, Director, NMED Resource Protection Division

## Attachment

### Introduction

The National Nuclear Security Administration (NNSA), a semi-autonomous agency within the United States (U.S.) Department of Energy (DOE), intends to prepare a Site-Wide Environmental Impact Statement (SWEIS) for the Lawrence Livermore National Laboratory (LLNL or Laboratory) in Livermore, California (LLNL SWEIS).<sup>1</sup> The Proposed Action Alternative will include continued operations and foreseeable new and/or modified operations/facilities to address aging infrastructure concerns at LLNL.

NNSA identified four categories of actions associated with the Proposed Action: (1) New Facility Construction Projects; (2) Modernization/Upgrades of Existing Facilities and Infrastructure; (3) Operational Changes; and (4) Decontamination, Decommissioning, and Demolition Projects. Decontamination, decommissioning, and demolition of older facilities would be conducted on a continuing basis to eliminate excess facilities and reduce costs and risks. NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished. In addition to waste generated by proposed decontamination, decommissioning, and demolition activities, proposed changes in LLNL operations may result in changes in generated wastes and shipments to disposal sites.

A recent assessment report of radioactive waste management at LLNL evaluated waste generation, characterization, packaging, and shipment to the DOE Waste Isolation Pilot Plant (WIPP) site in New Mexico.<sup>2</sup> The New Mexico Environment Department (NMED) submits the following comments that are related to the transportation of LLNL's radioactive waste, which may include demolition and other material resulting from the proposed action, through the State of New Mexico for disposal at the WIPP site.

### Comments

- 1. The SWEIS must include a description of the radionuclides and activities of waste that will be transported to New Mexico for disposal at WIPP, along with anticipated changes in waste generation and disposal that will result from the Proposed Action.**

The Notice includes a list of 22 issues that NNSA is considering for a preliminary environmental analysis. NNSA must retain items 10 and 11, "Impacts from traffic and transportation of radiological and hazardous materials and waste on and off the LLNL sites" and "Pollution prevention and materials and waste management practices and activities." For New Mexico and other state, tribal and local governments to be able to participate effectively in this NEPA process, NNSA must carefully consider environmental issues associated with any action alternative that involves transportation and waste management outside of the Livermore, California area. For example, this information is needed for emergency planners and first responders in the State of New Mexico who may be called upon in the event of a transportation accident or release incident at the WIPP site.

In exploring all impacts associated with action alternatives that involve transportation of material to New Mexico, the SWEIS and the Proposed Action must provide for protection of New Mexico water sources and water supply systems from accidental releases of radioactive materials that may occur along transportation routes in the state. It is critical that all action alternatives evaluated as part of the SWEIS ensure compliance with packaging and transport regulations and emergency response

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2020-08-05/pdf/2020-17054.pdf>

<sup>2</sup> <https://www.energy.gov/sites/prod/files/2019/12/f69/LLNL%20TRU%20Waste%20Management%20Assessment%20Summary%20Report.pdf>

protocols to the greatest extent possible in order to protect water sources and water supply systems from accidental releases of radioactive materials.

Adequate transportation planning should demonstrate an awareness of public water supply facilities (groundwater wells or surface water intakes) located within one mile of transportation corridors in New Mexico and other states where low-level, transuranic, and/or other radioactive materials may be transported. An inventory of facility locations and protocols for spills that could affect water systems and supplies is missing from the Environmental Consequences section (or similar) of the SWEIS which merits correcting.

**2. Action Alternatives in the SWEIS that involve transporting material from LLNL to New Mexico must ensure any action will achieve environmental justice for the high percentage of minority and low-income populations in the State of New Mexico. These populations have already suffered disproportionately high adverse human health and environmental effects from nuclear energy and weapons programs of the United States.**

LLNL’s disposal of waste at the WIPP Site is among the ranks of uranium mining and milling, legacy contamination at national laboratories, and disposal of defense waste at the WIPP Site, which have long created risks to public health and the environment in the State of New Mexico that are disproportionately greater than such risks to the general population of the United States.

New Mexico’s general percentages of minority (Hispanic or Latino and American Indian) and low-income populations are significantly greater than in the United States’ general population (Table 1).

**Table 1. New Mexico and United States Demographics.**

Demographic	United States	New Mexico
Hispanic or Latino	18.3%	49.1%
American Indian	1.3%	10.9%
Persons in poverty	11.8%	19.5%

Source: U.S. Census Bureau QuickFacts  
<https://www.census.gov/quickfacts/fact/table/US/PST045219>

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, February 11, 1994, states that “... each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations of the United States.”<sup>3</sup>

The Council on Environmental Quality (CEQ) issued Environmental Justice Guidance under NEPA on December 10, 1997, that stated “[A]gencies should consider the composition of the affected area, to determine whether minority populations, low-income populations, or Indian tribes are present in the area affected by the proposed action, and if so whether there may be disproportionately high and adverse human health or environmental effects on minority populations, low-income populations, or Indian tribes.”<sup>4</sup>

<sup>3</sup> <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

<sup>4</sup> <https://ceq.doe.gov/docs/ceq-regulations-and-guidance/regs/ej/justice.pdf>

The SWEIS must carefully evaluate environmental justice considerations for the high percentage of minority and low-income populations in the State of New Mexico who have already suffered disproportionately high adverse human health and environmental effects from nuclear energy and weapons programs of the United States.

The SWEIS must include a proper risk assessment that evaluates all potential release scenarios and that quantifies incident-specific and cumulative impacts to vulnerable populations in New Mexico. In accordance with Executive Order 12898, with CEQ guidance, every aspect of the Proposed Action must provide the highest level of protection to New Mexico citizens, including use of best available technology in these safeguards.



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

October 20, 2020

Ms. Fana Gebeyehu-Houston  
NEPA Document Manager  
National Nuclear Security Administration, Livermore Field Office  
7000 East Avenue, L-293,  
Livermore, CA 94550-9234  
Sent by e-mail to: [LLNLSWEIS@NNSA.DOE.GOV](mailto:LLNLSWEIS@NNSA.DOE.GOV)

**Re: Notice of Intent To Prepare a Site-Wide Environmental Impact Statement (EIS) for Continued Operation of the Lawrence Livermore National Laboratory (LLNL)**

Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced document in the context of Zone 7's mission to "deliver safe, reliable, efficient, and sustainable water and flood protection services" within the Livermore-Amador Valley. Following are our comments for your consideration:

1. **Water Supply.** The EIS should include an analysis of water demands from providers like Zone 7, the City of Livermore, the San Francisco Public Utilities Commission, and others as applicable, preferably over the next 20-25 years. The analysis should identify the type of water supply needed (e.g., treated water, recycled water) from each provider. For questions on water supply, contact Amparo Flores at [aflores@zone7water.com](mailto:aflores@zone7water.com) or 925-454-5019.
2. **Stormwater / Flooding.** The EIS should include a comprehensive analysis of stormwater runoff and contribution to local flood control channels. Be advised that recent hydraulic modeling done by Zone 7 indicates potential flooding in the northwest corner of the LLNL property. Please contact Jeff Tang for more information, [JTang@zone7water.com](mailto:JTang@zone7water.com), 925-454-5075.
3. **Livermore Valley Groundwater Basin.** The project area lies over a portion of the Livermore Valley Groundwater Basin; as such, the underlying groundwater is subject to the management provisions of the basin's Alternative Groundwater Sustainability Plan (GSP), which was prepared by Zone 7 Water Agency and approved by the State Department of Water Resources. As the designated Groundwater Sustainability Agency (GSA), Zone 7 Water Agency strives to maintain sufficient groundwater supplies and good groundwater quality within the groundwater basin. To support these goals, the project should be consistent with the GSP and Zone 7's Sustainable

Groundwater Management Ordinance, as well as the State's Water Recycling Policy (and associated orders), the State's storm water protection measures, and the County's Water Wells Ordinance. Many of these documents can be found on Zone 7's website; <https://www.zone7water.com>.

Our records indicate that contaminants in the groundwater originating from LLNL are present beneath the site. Active remediation and monitoring are ongoing and managed by the Regional Water Quality Control Board (RWQCB), the Environmental Protection Agency, and the Department of Toxic Substance Control. For more information regarding the cleanup action, please contact David Tanouye from RWQCB at (510) 622-2360.

4. **Wells.** All wells in the project area must be protected or decommissioned. Well construction, modification, and destruction must comply with Alameda County's "Water Wells Ordinance" ([General Ordinance Number 0-2015-20](#)) in Eastern Alameda County and well completion reports must be submitted to Zone 7 Water Agency.
5. **General: Water-wise Landscaping.** Zone 7 encourages the use of sustainable, climate-appropriate, and drought tolerant plants, trees and grasses that thrive in the Tri-Valley area. Find more information at: <http://www.trivalleywaterwise.com>.

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at [erank@zone7water.com](mailto:erank@zone7water.com).

Sincerely,



Elke Rank

cc: Carol Mahoney, Amparo Flores, file

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August 28, 2020

SWEIS Comments

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
NNSA Livermore Field Office  
7000 East Avenue, L-293  
Livermore, CA 94550-9234

It's time to relocate the dirty work associated with the handling of energetic materials and nuclear stockpile maintenance, elsewhere.

Today we face a new reality of decades of population growth right to the borders of LLNL. We are now a sea of people all the way to the SF Bay. This population density renders some of LLNL's atomic stockpile maintenance, handling of weapons, and onsite energetic materials seem ludicrous to the extreme in mixing population and the dirty work needed for National Defense. An accident does not have to release a Fukushima level of radiation to destroy a huge swath of humanity physically and mentally. Relocate the dirty work elsewhere.

NEVER INTENDED TO BE WHAT IT'S BECOME

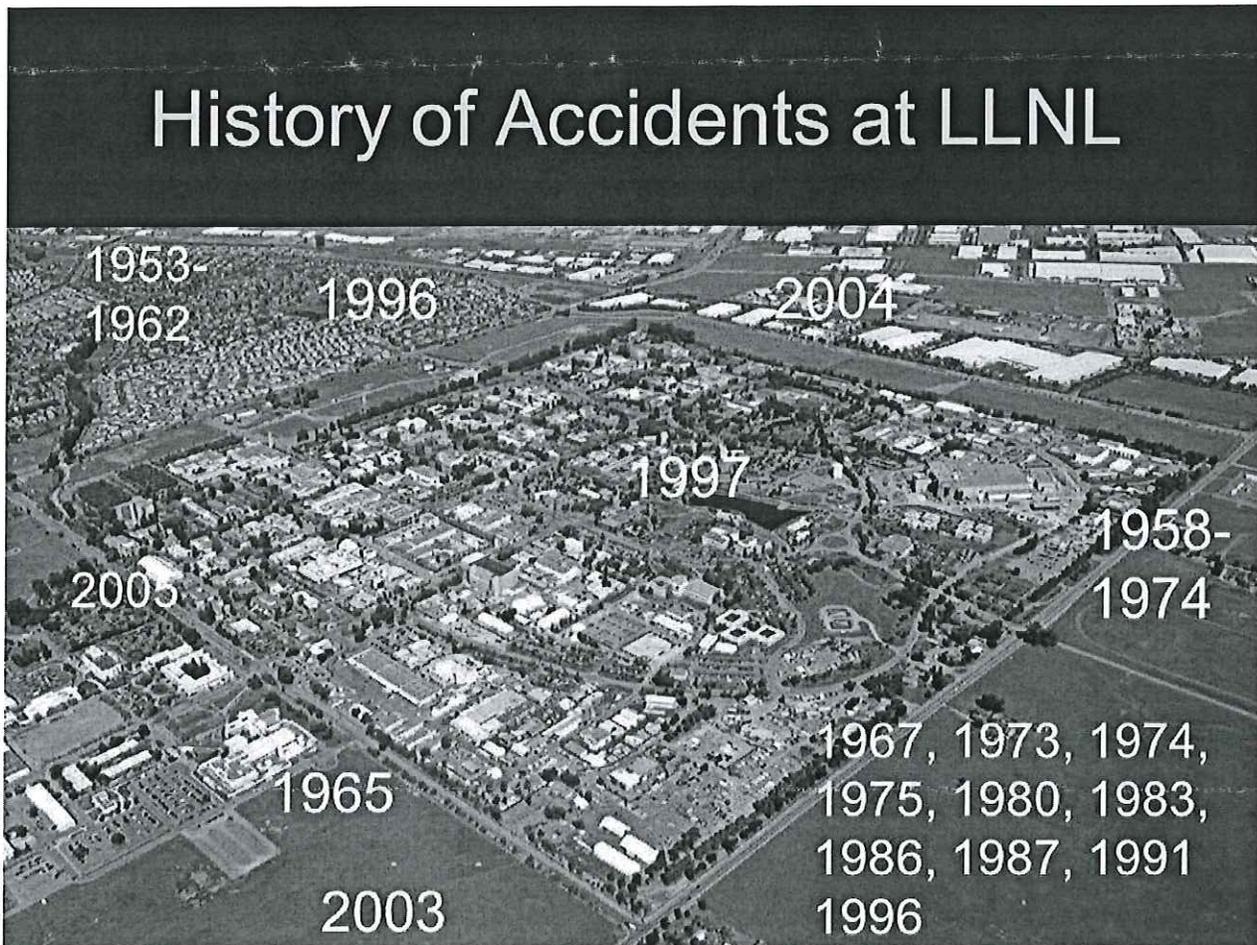
In 1943, we were a community of about 3800+- population. We were a tiny rural town surrounded by open, productive, ag lands. There was no atomic bomb. The Navy had two facilities, an auxiliary airbase for pilot training 3.4 miles east of Livermore. (Which is now LLNL, see portrayal of old town city limits) and a second lesser remembered facility, back off the Mines Road, south of town, about an hour's drive, the Navy had a Section or so of land used for dive-bomb training. It was the depth of allied air power superiority and ground forces that won the war, not the Bomb.

Soon after the development of the atomic bomb however, scientists at UC Berkeley wanted to retain and build off the future of nuclear research. There were no expectations or plans to handle nuclear weapons on site. Even the level of fissionable materials on site was nil.

LLNL grew into a runaway, nonstop dog and pony show between the prestigious influence and aura of LLNL founders and cold war politics run by a military industrial complex. The cold war is over. Move the dirty work portion of LLNL stockpile maintenance into an unpopulated area.

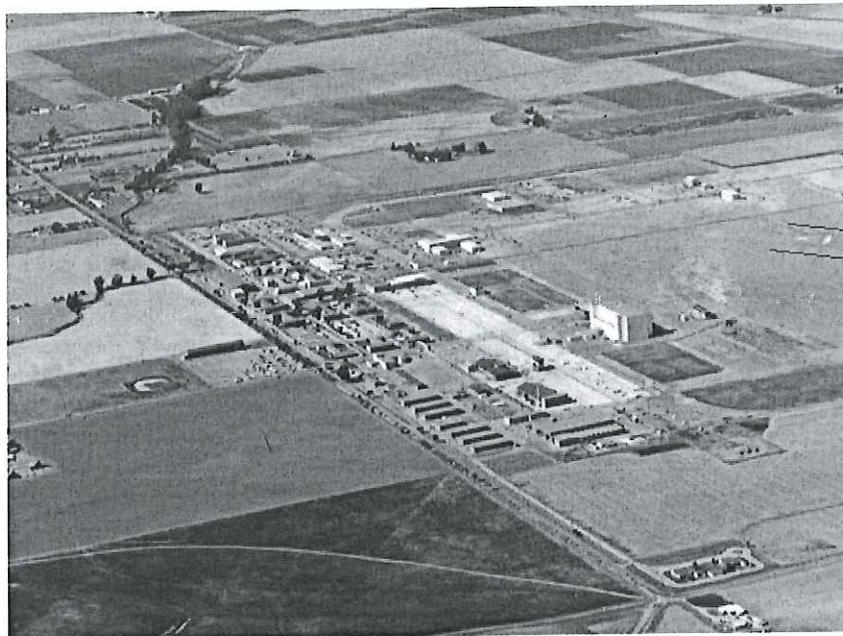


Mishaps occur, people commit suicide even in critical material handling jobs. Tell us about the young man who pressed two parts of plutonium together in the critical materials handling department, created a blue flash, and was dead within minutes as his body melted away from the destroyed bone structure. (as reported by his recently deceased lab worker) Fortunately he was humble and did not have vengeance in his heart, God rest his soul, or LLNL would have lost its license on that day. Tell us about that. Or tell us about some of these other mishaps in the attached and inserted photo.



Can we agree, mishaps happen? Move the dirty work.

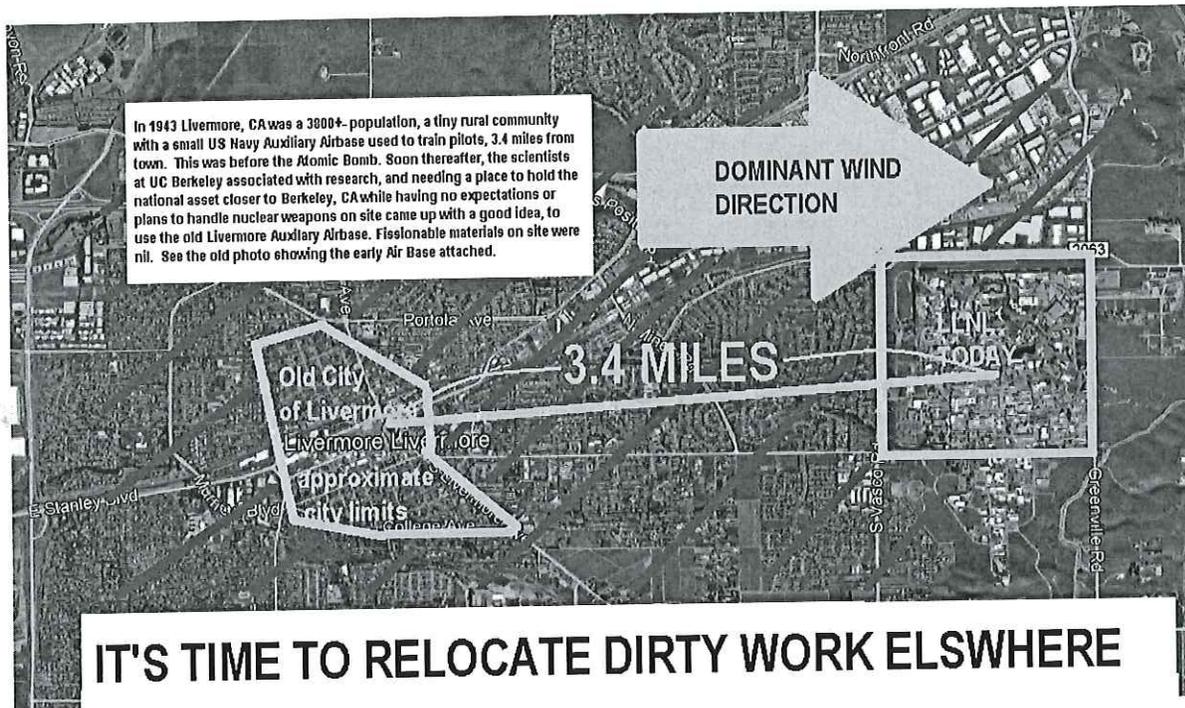
Look how innocently far away from the population the original laboratory was located. Move the dirty work.



WWII USN AUXILIARY AIR BASE

Move the dirty work. It's too close to our population. (insert for old vs current population)

*Rich Buckley*



Today we face a new reality that renders some of LLNL's atomic stockpile maintenance and handling of weapons seem ludicrous to the extreme in mixing population with weapons and fissionable materials. An accident does not have to release a Fukushima level of radio activity to destroy a huge swath of humanity physically and mentally. It's time to relocate the dirty work elsewhere.

*Rich Buckley*

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# MARK V. CONNOLLY

Attorney at Law

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August 28, 2020

Fana Gebeyehu-Houston  
U.S. Department of Energy  
National Nuclear Security Administration  
Livermore Field Office  
PO Box 808, L-293  
7000 East Avenue  
Livermore, CA 94551-0808

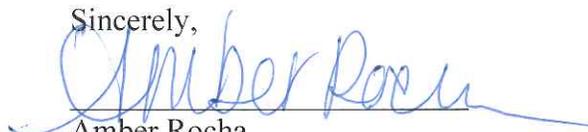
**Re: Mark V. Connolly/Connolly Ranch – Change of Address**

Dear Fana,

Please take note of Mr. Connolly's new mailing address as follows: PO Box 1109, Tracy, CA 95378. Please send all further correspondence to the new address.

Thank you for updating your records.

Sincerely,



Amber Rocha,  
Assistant to Mark V. Connolly



August 31, 2020

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND  
PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT  
STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

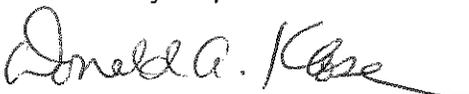
This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

Signed, 

**Name: Donald A. Klose**

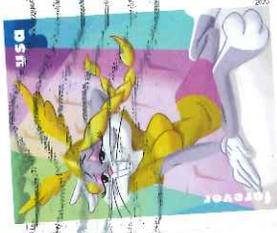
**Email and/or postal address: 191 Bayside Ct., Richmond, CA 94804**

**Email: donklose44@gmail.com**

Don Klose  
191 Bayside Ct.  
Richmond, CA 94804

OAKLAND CA 94615

ALBERTSONS #131



Ms. Fana Gebeyehu - Houston  
NEPA Document Manager  
Lawrence Lawrence National Laboratory  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

94551-0808



September 5, 2020

Fana Gebeyehu-Houston  
Department of Energy  
National Nuclear Security Administration  
Livermore Field Office  
PO Box 808, L-293  
700 East Avenue  
Livermore, California 94551-0808

Dear Ms. Gebeyehu-Houston:

I recently received a copy of the attached letter. Thank you for the information.

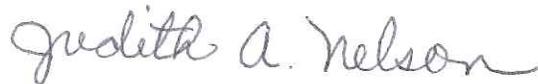
In March of 2020 I moved to Mountain Home, Arkansas. Would you please change my home and mailing address to:

Judith A. Nelson  
1220 E 16<sup>th</sup> St.  
Mountain Home, AR 72653-9242

If you need any further confirmation, my phone number is 925-640-3103 and my e-mail address is [gramajudy@comcast.net](mailto:gramajudy@comcast.net)

Thank you very much for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Judith A. Nelson".

Judith A. Nelson



Department of Energy  
National Nuclear Security Administration  
Livermore Field Office  
PO Box 808, L-293  
7000 East Avenue  
Livermore, California 94551-0808



**AUG 14 2020**

5440  
NNSA-2020-006975-MO-01

Dear Laboratory Neighbor:

The National Nuclear Security Administration (NNSA) which administers Lawrence Livermore National Laboratory (LLNL) for the U.S. Department of Energy (DOE) will prepare a Site-Wide Environmental Impact Statement (SWEIS) for LLNL's Livermore Site and Site 300 near Tracy, CA. The SWEIS will provide the general public with an analysis of potential environmental impacts from ongoing and reasonably foreseeable new and modified operations at both sites over the next 10 to 15 years. The last SWEIS for LLNL was completed in 2005 and a Supplement Analysis of that SWEIS was completed in 2011.

The SWEIS will be prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. §4321 et seq.), the Council on Environmental Quality's NEPA regulations [40 Code of Federal Regulations (CFR) 1500-1508] and the DOE NEPA Implementing Procedures (10 CFR Part 1021). As part of the SWEIS process, the general public is invited to participate by providing input during the initial planning or scoping period and later when a draft SWEIS document becomes available for formal public review and comment.

Due to the ongoing response to the Coronavirus Disease 2019 (COVID-19) pandemic and in compliance with evolving state and local instructions regarding social distancing, NNSA will be conducting the scoping period for this SWEIS primarily via the internet. Information about LLNL, the SWEIS, and how the general public can submit comments during the scoping process is available online at: <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>.

The public is also invited to participate in a virtual NNSA-hosted Scoping Meeting on Wednesday, September 2, 2020, where comments will be accepted on the scoping process. Information about how to join that meeting will be available at the reading room website above. Public comments will be accepted until Monday, September 21, 2020, which is the end date for the scoping period.

We hope that you will take this opportunity to participate in this very important process as we plan for LLNL's future.

Sincerely,

*Fana Gebeyehu-Houston*

Fana Gebeyehu-Houston  
Lawrence Livermore National Laboratory  
Site Wide Environmental Impact Statement  
Project Manager/Document Manager

J. Nelson  
1220 E 16th St.  
Mountain Home, AR 72653

WWW.ARKANSAS

AR 727

08 SEP 20

PM 34



Fana Sebeyehu - Houston  
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94551-080808



Kathy Labriola  
1714 9th Street  
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OAKLAND CA 9465

6 OCT 2020 PM 5 L



FOREVER

Energy Awareness Week

Ms. Tara Delaney-Hunter  
NERA Document Manager, NNSA  
Lawrence Livermore Lab  
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94551-0808

Kathy Labriola  
1714 9th Street  
Berkeley CA 94710

October 3, 2020

Ms. Fana Gebeyehu-Houston, NEPA Document Manager, (NNSA)

Lawrence Livermore National Laboratory

PO BOX 808

Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I am submitting comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA. The SWEIS should develop an alternative future for Livermore Lab, where the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. This SWEIS will guide activities at Livermore Lab for the next 15-years or more.

Both the Livermore Lab Main Site and the Livermore Lab Site 300 high explosives testing range have been on the EPA's Superfund list of most contaminates sites in the nation for over 30 years. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers. Both locations have cleanup activities that will need to continue for the next 40 years or more.

More than 2,000 current and former Livermore Lab employees have applied for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults.

Sincerely,



Kathy Labriola

Johana Lozano  
6441 Hereford Dr.  
Los Angeles CA 90022



Ms. Fana Gebeyehu - Houston  
NEPA Document Manager  
Lawrence Livermore National Laboratory  
P.O. Box 808, L-293  
Livermore CA 94551-0808

October 5, 2020

Ms. Fana Gebeyehu-Houston  
NEPA Document Manager  
National Nuclear Security Administration (NNSA)  
Lawrence Livermore National Laboratory (LLNL)  
P.O.Box 808, L-293  
Livermore, CA 944551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

- 1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs.** The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
- 2. The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."*
- 3. The SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing

range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS.

- 4. The SWEIS must include compensation for past worker exposures. Also, it must consider future worker exposure to radioactive and toxic materials.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses.
- 5. The emission (release) limits for all hazardous materials should be reduced, not increased.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed.
- 6. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these Plutonium and Uranium were removed.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of Plutonium and highly enriched Uranium were the specific materials removed in bulk quantities at that time.
- 7. The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity complies with the aforementioned MAR and administrative limits.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead

under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. The environmental review document for pit production at Los Alamos contains a chart demonstrating that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production?

- 8. an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS.
- 9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300.** Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.
- 10. The SWEIS must analyze the impact of fires and other extreme weather events on the Livermore Lab.** In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.
- 11. The SWEIS must provide a detailed budget and plan for decontamination D&D work and a current maintenance plan of High-Risk Excess facilities.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead

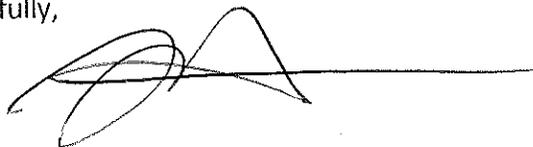
“reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

- 12. The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years.** Expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. The SWEIS must include stakeholder input for determining the “needs” of Livermore Lab that might be duplicative of other NNSA sites.
- 13. The SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law. A new NPR could be underway even before the SWEIS process is completed.** The “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. In order to pass this legislation effectively, it must stand on its own.
- 14. The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Very respectfully,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal line extending to the right.

Johana Lozano-BA in Chemistry - Grinnell College and Boren Scholar

johana.lozano@aol.com  
6441 Hereford Drive  
Los Angeles, CA 90022

[https://www.independentnews.com/mailbox/submit-your-letters/article\\_bfa58b12-093e-11eb-b932-e3bc87b0b045.html](https://www.independentnews.com/mailbox/submit-your-letters/article_bfa58b12-093e-11eb-b932-e3bc87b0b045.html)

Opinion

## Submit Your Letters

Oct 8, 2020

*Raiza Marciscano-Bettis, Livermore*

I would like to let the community of Livermore know the importance of submitting a letter to the National Nuclear Security Administration (NNSA) to outline important issues, questions and topics that must address in the upcoming Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore and Site 300 high explosives testing range near Tracy.

More than 2,000 current and former Livermore Lab employees have applied through the Labor Department for compensation for serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must analyze worker exposures and consider worker health and safety.

NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. There shouldn't be any justification for the increase of any radioactive emissions. If anything, it should be reduced.

The SWEIS should analyze an alternative future for Livermore Lab; one in which the lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. Furthermore, the decision makers and the public should have these facts in hand when making decisions in regards nuclear weapons.

The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminates sites in the nation in 1987. The Site 300 high explosives testing range near Tracy was placed on the EPA Superfund list in 1990. It will take 60 to 80 years, if not more, for the cleanup of radioactive toxins.

As a resident of the Central Valley, I am particularly concerned about Livermore Lab's plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as 10 fold per each blast and more than seven fold annually.

Please, it is important to write your letter and send it by email to [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov).

For more information on this issue, you can visit [www.trivalleycares.org](http://www.trivalleycares.org) or email [Marylia@earthlink.net](mailto:Marylina@earthlink.net). If you are a Spanish speaker, you can email [raiza@trivalleycares.org](mailto:raiza@trivalleycares.org). I will gladly help to translate your letter and send it.

NNSA will hold a second virtual public meeting on Monday, Oct. 5, from 6 to 7:30 p.m. Pacific Time. Deadline for public comment is Wednesday, Oct. 21, 2020. For the NNSA NEPA reading room, visit [energy.gov/nnsa/nnsa-nepa-reading-room](https://energy.gov/nnsa/nnsa-nepa-reading-room).



DEPARTMENT OF PARKS AND RECREATION

Armando Quintero, Director

Diablo Range District  
15751 Tesla Road  
Livermore, CA 94550

October 19, 2020

Department of Energy  
National Nuclear Security Administration  
Attn: Fana Gebeyehu-Houston  
Livermore Field Office  
PO Box 808, L-293  
700 East Avenue  
Livermore, CA 94551-0808

RE: California State Park's Comments on LLNL's NOTICE OF INTENT TO PREPARE A SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT (SWEIS)

Dear Ms. Gebeyehu-Houston;

California State Parks (CSP) offers the following comments on the preparation of Site-Wide Environmental Impact Statement (SWEIS) for foreseeable operations of Lawrence Livermore National Laboratory Livermore (LLNL) Site and Site 300 near Tracy, CA. This SWEIS will analyze impacts from construction of 55 new facilities, upgrades of 65 existing facilities, changes to the tritium emissions limits and administrative limits of plutonium, and the decommissioning of 110 existing facilities.

CSP owns and operates Carnegie State Vehicular Recreation Area (SVRA) which is adjacent to Site 300. Carnegie SVRA is approximately 5,000 acres with approximately 1,500 acres open to the public. The park offers high quality off-highway vehicle (OHV) recreation opportunities in the way of trails, tracks, and a campground while preserving the natural and cultural resources of this area. The park is also the headquarters for the Diablo Range District has over 40 employees that report to the park on a regular basis. In addition, the park has nine residential units that house employees and their families.

CSP passed a general plan in 2016 that identifies land use objectives for the 3,500 acres currently closed to the public. Future uses include motorized and non-motorized recreational opportunities.

CSP is concerned with possible contamination of the environment from Site 300 operations specifically to surface water, ground water, air, and soils. The potential negative impacts could affect the visitors, staff, residences, and the natural and cultural resources of the park. The SWEIS should identify all potential impacts to the park and measures that LLNL intends to implement to mitigate, minimize, and avoid such impacts. CSP would also appreciate

being included in any emergency response planning, as appropriate, in order to provide for a coordinated and effective response in the event of an emergency.

CSP understands that LLNL anticipates the draft SWEIS to be released in the summer of 2021 and we look forward to the opportunity to review and comment at that time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Guaracha', with a large, stylized flourish at the end.

Eduardo Guaracha  
Diablo Range District Superintendent

**From:** [Peter aronson](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL SWEIS  
**Date:** Wednesday, September 2, 2020 1:30:09 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could

submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

Thank You ~

**Peter Aronson** 4220 Browns Road Eureka, CA. 95503 [aronson@humboldt1.com](mailto:aronson@humboldt1.com)

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**From:** [Grant Bakewell](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] RE: immediate extension of the public comment period!  
**Date:** Tuesday, September 1, 2020 1:31:44 PM

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God's Peace be with you!

Due to the imminent danger posed by California's SCU Lightning Complex Fire, the Livermore nuclear weapons lab's Site 300 was evacuated last week. As a nearby resident with family and friends who could be seriously impacted by increased nuclear materials of **any** kind on this site, let alone the proposed open-air testing, this is to request your immediate extension of the public comment period from 45 to 90 days, followed by a second virtual public meeting to review all public comment before submitting or approving any Environmental Impact Statement.

The mere thought of adding even more, new or "refurbished" nuclear weapons to our present arsenal is shocking, morally repugnant, and unconscionable in light of our growing security needs for basic human health (including a vaccine), safety from wildfires, safe and "refurbished" infrastructure, and full employment in vocations and work which serve the common good.

I urge you to do the right thing, and postpone these hearings until the full impact of our present leaders' decisions concerning our nation's, and our region's safety and security can be fully and fairly assessed.

Thank you for your time and attention to this urgent concern.

Blessings and Peace+  
Grant Bakewell, BCC  
Longterm Care Chaplain  
Associate Priest, St. Matthew's Episcopal Church, Sacramento  
**"Man must evolve for all human conflict  
a method which rejects revenge, aggression and retaliation.  
The foundation of such a method is love."  
Dr. Martin Luther King, Jr.**  
Nobel Peace Prize acceptance speech,  
Stockholm, Sweden, December 11, 1964

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**From:** [Grant Bakewell](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [marylia@trivalleycares.org](mailto:marylia@trivalleycares.org)  
**Subject:** [EXTERNAL] A chaplain's testimony re: Environmental Impacts of Site 300  
**Date:** Wednesday, October 21, 2020 11:26:27 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager

National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

Thank you for extending the comment period for the scoping hearings on the environmental impact of further storage and testing of high explosives and nuclear materials at the "Site 300" extension of Livermore Lab.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”*

Therefore I submit this testimony as a citizen and voter in Carmichael, California, as a nationally board-certified chaplain to people of every faith for the past 10 years, and as an Episcopal Priest from the Diocese of Northern California, wherein our neighboring Diocese of California includes several Episcopal congregations located within a few miles of Livermore Lab and Site 300. Given previous testimony concerning superfund cleanup sites at both Livermore Lab and Site 300, as well as documented radiation leakages from these sites, the presence of these sites near residential neighborhoods constitutes a clear and present danger to the security, health, and environment of the citizens of Livermore, including the very members of my denomination.

***“Early identification of concerns,***

In addition to public health and safety, below are additional serious concerns.

## Legal Concerns:

(1) Design, testing, manufacture, and use of Weapons of indiscriminate mass civilian destruction are a violation of International Law. No nation has the right to target, threaten, or kill innocent civilians, even during times of war. When done by individuals, this is called terrorism. When committed by nations, it is called a war crime, and the Nuremberg Tribunal was very clear in assigning criminality to those who knowingly cooperated or carried out such terrorism by the German State, not just those in leadership positions.

(2) Most recently (in fact, as reported just yesterday) the Trump administration has met with their Russian counterparts to initiate a freeze on nuclear warheads on both sides, as a preliminary step toward hopeful re-implementation of the "New Start" treaty for nuclear disarmament . As reported in the Washington Post:

"The United States and Russia edged toward an arms control deal Tuesday after Moscow **agreed to a freeze on the number of nuclear warheads on each side** and to extend the accord known as New START for one year....

"Russia's Foreign Ministry put forward the proposal Tuesday, and within hours, the State Department expressed gratitude for the offer and requested an immediate meeting of negotiators.

"We appreciate the Russian Federation's willingness to make progress on the issue of nuclear arms control," State Department spokeswoman Morgan Ortagus said in a statement. "The United States is prepared to meet immediately to finalize a verifiable agreement. We expect Russia to empower its diplomats to do the same." ...**A warhead freeze was a condition demanded by the Trump administration,**" (emphasis added, the article is referenced here:

<https://www.washingtonpost.com/world/russia-ready-to->

[freeze-total-number-of-warheads-for-one-year-to-extend-nuclear-pact-with-us/2020/10/20/2c0b06c0-12bc-11eb-a258-614acf2b906d\\_story.html](https://www.washingtonpost.com/archive/local/2020/10/20/freeze-total-number-of-warheads-for-one-year-to-extend-nuclear-pact-with-us/2020/10/20/2c0b06c0-12bc-11eb-a258-614acf2b906d_story.html)

A warhead freeze would thus insure the continuation of a bilateral agreement toward nuclear disarmament. Further development of the W-89 warhead at Livermore, or **ANY** design or testing of new warheads anywhere--including site 300--would thus constitute a violation of the spirit AND the letter of this treaty, at least as currently reported.

**Economic Concern:** The "lion's share" of our present national debt is due to repeated unjust invasions of other nations without the Constitutionally required declaration of war, and, on hindsight, without sufficient moral, ethical, or evidential pretext for such invasion. In addition to the dramatic erosion of US moral leadership, our children and grandchildren will be responsible for paying off this financial debt resulting from decades of unjustifiable use of military force, including the design, testing, and production of nuclear weapons.

The currently projected 2.5 Trillion for NEW or "refurbished" nuclear weapons, especially in light of recent fires, floods, Covid-19 virus, and depletion of our schools and infrastructure is thus also an economic decision of colossal folly. Instead, our nation, and the rest of the world, must still hear and heed the call for a global cease fire by UN Secretary General Guterres, and a redirection of military spending to vitally important human health care needs, including finding a vaccine and cure for this virus.

**Psychological concern:** Weapons of mass destruction do not make any of us safe, or our nation more secure. Like alcohol and drug addiction, they offer the illusion of well-being or temporary safety, but ultimately lead to ever greater insecurity, bodily destruction, and untimely death. They have become a source of massive psychological and emotional

insecurity for both present and future generations. Like an alcoholic who must learn by the Grace of God--the God of their present understanding--to live one day at a time without alcohol, so must our nation move immediately toward sobriety and recovery from a massive dependency upon weapons--particularly weapons of mass destruction--as a "false god", a serious addiction, and a dangerous delusion. Instead, such weapons must be de-funded, dismantled, and abolished.

**Spiritual Concern:** A few days after the atomic bombing of Hiroshima Mahatma Gandhi said: "I hold that those who invented the atomic bomb have committed the gravest sin. The atomic bomb brought an empty victory to the Allied arms, but it resulted for the time being in destroying Japan. What has happened to the soul of the destroying nation is yet too early to see... The decision to design, manufacture, test, and use these weapons for any reason, as our nation has twice done to innocent civilians, and done hundreds of times in the South Pacific and the Nevada Desert, has resulted in radiation sickness and poisoning, and the loss of hundreds of American lives.

This is, in fact, a moral and spiritual outrage! As Billy Graham himself once said, "It is a sin to use a nuclear weapon". And if it is a sin to use one, it is a sin to make one, to test one, and to even design one! We must not further waste our precious time on this earth paying for or making room for the testing or storage of dangerous radioactive and explosive substances. The life of our planet and the future of our children is in the balance. Among the last words of Moses, as recorded in Deuteronomy, as the children of Israel were on the verge of entering the promised land, are these:

"See, I set before you today life and prosperity, death and destruction. For I command you today to love the Lord your God, to walk in obedience to him, and to keep his commands, decrees and laws; then you will live and increase, and the Lord

your God will bless you in the land you are entering to possess.

“But if your heart turns away and you are not obedient, and if you are drawn away to bow down to other gods and worship them, I declare to you this day that you will certainly be destroyed. You will not live long in the land you are crossing the Jordan to enter and possess.

“This day I call the heavens and the earth as witnesses against you that I have set before you life and death, blessings and curses. Now choose life, so that you and your children may live” (Deut. 30:15-19, NIV)

Our planet and her people desperately need the knowledge and skill of Livermore scientists, AND those engaged in environmental review, *not* to engage in the absurd idolatry of national security through ever more lethal weapons of mass destruction, but to **“choose life, so that we and our children shall live”**.

### ***Potential impacts,***

It remains difficult to see what aspects of human life, or the planet itself, would NOT be impacted by your decisions. And not only yours, but the accumulated decisions of 75 years of nuclear weapons design and testing at Livermore Lab and Site 300. The long term impact of nuclear winter, or even the mistaken use or misuse of even one weapon, as at Hiroshima, is too horrific to imagine. But the short term impact on human health, the environment, important infrastructure, and the US taxpayer, along with the “opportunity cost” of well over 2 Trillion dollars of wasted and dangerous efforts at achieving “nuclear superiority” is difficult to calculate, but obviously immense. Finally, the impact on the very human souls of those funding, directing, or engaged in this despicable enterprise,

may not ever be seen, but will be felt for generations to come by our children who will continue to ask the question, as we did of "Good German Christians" in seminary, "Why? Why did you let yourself become so blind that you, and we, could not see the degree of human suffering and evil that is already a consequence of the past 75 years of nuclear weapons production, all of which **originated right here** in Livermore and Los Alamos?

***relevant effects of past actions and***

The thin but promising hope of turning back the now famous "doomsday clock" is now upon us with the international petition to abolish nuclear weapons, as promoted by the Nobel Peace Prize-winning "ICAN" network. And now, just yesterday, comes the extension of the "New Start" treaty to freeze the design, testing, and production of any new nuclear warhead. We cannot and **dare not** simultaneously pursue such promising solutions AND further consider storing nuclear and explosive materials in a residential area for the purpose of constructing new nuclear warheads!

***possible alternative actions."***

The "existential threat" of global climate change is already evident, while the similar existential threat of nuclear winter, or "armageddon" could be reduced, if not ultimately eliminated, by deliberate and progressive steps toward closing site 300, ending all further work on nuclear weapons at Livermore and Los Alamos, and supporting the still-growing international treaty for the reduction and ultimate abolition of nuclear weapons.

What a wonderful act of true contrition and repentance it would be if such an effort were led by the very nation which first used these awful weapons against innocent civilians, with a treaty monitored by the very laboratories which first designed and manufactured them, and, now, finally agreed to

abolish them!

This is the alternative action for which I, and many others pray daily. I hope you will hear and heed our prayers, and this testimony, and act accordingly.

God's Blessings and Peace,  
Rev. Grant Bakewell, BCC  
Chaplain and Associate Priest, Trinity Episcopal Cathedral,  
Sacramento, California

**"Man must evolve for all human conflict**

**a method which rejects revenge, aggression and retaliation.  
The foundation of such a method is love."**

**Dr. Martin Luther King, Jr.**

Nobel Peace Prize acceptance speech,  
Stockholm, Sweden, December 11, 1964

\*\*\*\*\*

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**From:** [Marilyn Bechtel Becchetti](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Comments re NNSA SWEIS for Livermore Lab and Site 300  
**Date:** Wednesday, October 21, 2020 9:05:28 AM

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By email to: [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager,  
National Nuclear Security Administration (NNSA)  
Lawrence Livermore National Laboratory (LLNL)

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

- 1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
- 2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.
- 4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for

compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

**5.** The NNSA “Scoping Meeting” slides on the SWEIS contain the following statement: *“Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.”* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab’s operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *“Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.”* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction)

for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *"Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished."* It is assumed that this includes the *"High-Risk Excess Facilities"* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead "reallocated" to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *"purpose and need"* for the review. In that section the NNSA claims: *"The U.S. nuclear weapons infrastructure is aging and historically underfunded."* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to "modernize" is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *"is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition."* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

**13.** The "purpose and need" statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the "need" for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the "purpose and need" statement for the SWEIS is heavily dependent on the Trump Administration's controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS "purpose and need" should not be driven by the Trump NPR, which in any event is a policy document and not a law.

15. Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Marilyn Becchetti  
[mbec@mindspring.com](mailto:mbec@mindspring.com)

275 28<sup>th</sup> St., Apt. 732, Oakland, CA 94611

\*\*\*\*\*  
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**From:** [frank.belcastro](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] extension  
**Date:** Thursday, August 27, 2020 8:40:42 PM

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This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the **public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,***
2. *That a **second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and***
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

*frank belcastro*

\*\*\*\*\*

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\*\*\*\*\*

**Siino, Jacie Michalke**

---

**From:** frank belcastro <fpbelcast@gmail.com>  
**Sent:** Thursday, August 27, 2020 8:40 PM  
**To:** LLNLSWEIS  
**Subject:** [EXTERNAL] extension

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*frank belcastro*

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**Siino, Jacie Michalke**

---

**From:** Racharina B. <raiza613@gmail.com>  
**Sent:** Thursday, August 27, 2020 4:34 PM  
**To:** LLNLSWEIS  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON  
THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

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**Signed,**

**Name:**

**Email and/or postal address:**

\*\*\*\*\*

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**From:** [Alex Bettis](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE SWEIS  
**Date:** Thursday, August 27, 2020 4:57:58 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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**Signed, A. Bettis**

**Name: Alexandra Bettis**

**Email and/or postal address: [alexisabelville@gmail.com](mailto:alexisabelville@gmail.com)**

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**From:** [Racharina B.](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] EXTENSION OF PUBLIC COMMENT AND MEETING  
**Date:** Thursday, August 27, 2020 4:41:37 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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**Signed, Marty Bettis**

**Name: Marty Bettis**

**Email and/or postal address: 3560 Ridgecrest Way, Livermore, CA 94451**

\*\*\*\*\*

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**From:** [Makaela's Everything](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING  
**Date:** Thursday, August 27, 2020 4:47:24 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, M. Bettis**

**Name: Makaela Bettis**

**Email and/or postal address: [makaelagabrielville@gmail.com](mailto:makaelagabrielville@gmail.com)**

\*\*\*\*\*

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**From:** [Makaela's Everything](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING  
**Date:** Wednesday, September 9, 2020 11:35:09 AM

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OMG

On Mon, Aug 31, 2020 at 2:24 PM LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)> wrote:

Dear Ms. Bettis,

I am writing to acknowledge that the National Nuclear Security Administration's (NNSA) Livermore Field Office has received your email. Thank you for your input. We will be reviewing your suggestions carefully and will reply to you as soon as possible. We look forward to working with you and other stakeholders as we prepare a new Site-wide Environmental Impact Statement (SWEIS) for Lawrence Livermore National Laboratory. For immediate reference the date and time of the meeting is Wednesday, September 2, 2020 at 6pm Pacific Daylight Time and can be also accessed at the link in the Federal Register announcement.

Sincerely,

Fana Gebeyehu-Houston

NEPA Document Manager

Livermore Field Office

**From:** Makaela's Everything [mailto:[makaelagabrielville@gmail.com](mailto:makaelagabrielville@gmail.com)]

**Sent:** Thursday, August 27, 2020 7:47 PM

**To:** LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)>

**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A  
SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE  
ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

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- 4. That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, M. Bettis**

**Name: Makaela Bettis**

**Email and/or postal address: [makaelagabrielville@gmail.com](mailto:makaelagabrielville@gmail.com)**

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**From:** [Raiza Marciscano Bettis](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD  
**Date:** Thursday, August 27, 2020 4:31:08 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

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**Signed, Raiza Bettis**

**Name: Raiza Bettis**

**Email and/or postal address: 2458 Portola Avenue, Livermore CA, 94551**

*Raiza*

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**From:** [david](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] NNSA meeting re. LLNL on Sept. 2  
**Date:** Monday, August 31, 2020 2:38:07 PM  
**Attachments:** [mg\\_info.txt](#)

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*
5. *Provide at least 120 day notice to the public of any future public meetings*

Thanks,

David Bezanson, Ph.D.  
CA resident and voter

**From:** [DEETJE BOLER](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [marylia@trivalleycares.org](mailto:marylia@trivalleycares.org)  
**Subject:** [EXTERNAL] Wednesday, Sept. 2 meeting-EIS Scoping Process  
**Date:** Wednesday, September 2, 2020 11:32:58 AM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

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**Signed,  
Deetje Boler**

\*\*\*\*\*

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\*\*\*\*\*

**From:** [Mary Beth Brangan](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Scoping comments on SWEIS for LLNL  
**Date:** Monday, October 5, 2020 10:25:27 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

- 1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
- 2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface

waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

**5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "*Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.*" NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "*Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.*" Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material

testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was

supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of*

*weapons.*" This statement is left to stand without further explanation of what "testing" and "maintenance" entail. Yet, it is precisely the weapons work covered by that sentence that will create "significant impacts to the environment." The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Name: Mary Beth Brangan

Email: [mbrangan@gmail.com](mailto:mbrangan@gmail.com)

Postal Address: P.O. Box 1047, Bolinas, CA 94924

--

Mary Beth Brangan  
Co-Director, EON

Ecological Options Network  
Bolinas, CA 94924  
415-868-1900 - office  
415-246-1054 - cell

[www.eon3.net](http://www.eon3.net)  
<https://www.youtube.com/eon3>

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**From:** [Vernon Brechin](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS scoping comment  
**Date:** Thursday, September 3, 2020 9:45:20 PM

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RE: SWEIS

Ms. Fana Gebeyehu-Houston, NEPA Document Manager

In regards to the scope of the document it should take into account the warnings and the data contained in the following reports.

The Intergovernmental Panel on Climate Change (IPCC) five released assessment reports and the special reports that followed the main reports.

Additionally, the U.S. Fourth National Climate Assessment (NCA4) volumes released in October 2017 and in November 2018 should be taken into consideration as to how its findings are likely to affect the LLNL future operation.

It should be noted that at least a decade of history indicates that we are currently following the track of the most extreme changes projected by the IPCC climate models.

Sincerely,  
Vernon J. Brechin

\*\*\*\*\*

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**From:** [Maureen Brennan](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Extend public comment period  
**Date:** Wednesday, September 2, 2020 11:27:05 AM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This "hurry up" schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on "Main Street," and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab's Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public's capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name: Maureen Brennan**

**Email and/or postal address: 524 Rodeo CA 94572**

\*\*\*\*\*

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**From:** [Rich Buckley](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [Rich Buckley](#)  
**Subject:** [EXTERNAL] SWEIS Comments  
**Date:** Friday, August 28, 2020 1:10:29 PM  
**Attachments:** [image.png](#)  
[image.png](#)  
[image.png](#)  
[LLNL OLD USN AUXILIARY AIR BASE.bmp](#)  
[Accident Dates.bmp](#)  
[3.5 miles from town.bmp](#)  
[LLNL SWEIS COMMENTS.pdf](#)

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It's time to relocate the dirty work associated with the handling of energetic materials and nuclear stockpile maintenance, elsewhere.

Today we face a new reality of decades of population growth right to the borders of LLNL. We are now a sea of people all the way to the SF Bay. This population density renders some of LLNL's atomic stockpile maintenance, handling of weapons, and onsite energetic materials seem ludicrous to the extreme in mixing population and the dirty work needed for National Defense. An accident does not have to release a Fukushima level of radiation to destroy a huge swath of humanity physically and mentally. Relocate the dirty work elsewhere.

#### NEVER INTENDED TO BE WHAT IT'S BECOME

In 1943, we were a community of about 3800+- population. We were a tiny rural town surrounded by open, productive, ag lands. There was no atomic bomb. The Navy had two facilities, an auxiliary airbase for pilot training 3.4 miles east of Livermore. (Which is not LLNL, see portrayal of old town city limits) and a second lesser remembered facility, back off the Mines Road, south of town, about an hour's drive, the Navy had a Section or so of land used for dive-bomb training. It was the depth of allied air power superiority and ground forces that won the war, not the Bomb.

Soon after the development of the atomic bomb however, scientists at UC Berkeley wanted to retain and build off the future of nuclear research. There were no expectations or plans to handle nuclear weapons on site. Even the level of fissionable materials on site was nil.

LLNL grew into a runaway, nonstop dog and pony show between the prestigious influence and aura of LLNL founders and cold war politics run by a military industrial complex. The cold war is over. Move the dirty work portion of LLNL stockpile maintenance into an unpopulated area.

Mishaps occur, people commit suicide even in critical material handling jobs. Tell us about the young man who pressed two parts of plutonium together in the critical materials handling department, created a blue flash, and was dead within minutes as his body melted away from the destroyed bone structure. (as reported by his recently deceased lab worker) Fortunately he was humble and did not have vengeance in his heart, God rest his soul, or LLNL would have lost its license on that day. Tell us about that. Or tell us about some of these other mishaps in the attached and inserted photo.

image.png



Can we agree, mishaps happen? Move the dirty work.

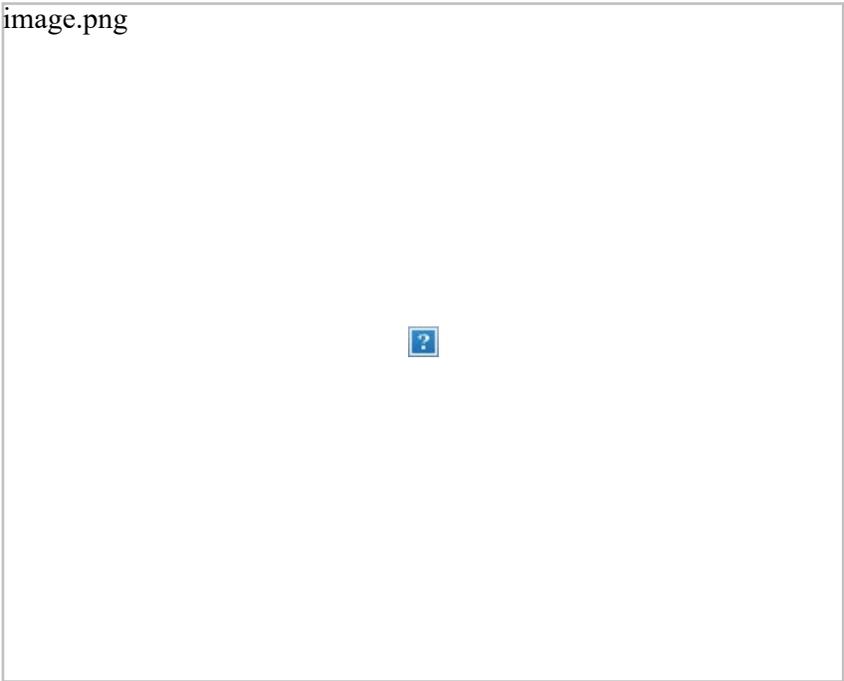
Look how innocently far away from the population the original laboratory was located. Move the dirty work.

image.png



Move the dirty work. It's too close to our population. (insert for old vs current population)

image.png



Rich Buckley

--

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[Facebook Home Page](#)  
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*Your kind words are my life's blood. I live to serve others. I can't thank you enough when you mention my name to your friends to help them with their real estate needs... Rich Buckley*

\*\*\*\*\*

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**From:** [dbsorbit@earthlink.net](mailto:dbsorbit@earthlink.net)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS guidance for Livermore Lab  
**Date:** Tuesday, October 6, 2020 9:51:43 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions." Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
2. The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "Approximately 55 new facility construction projects..." The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
3. The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.
4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios." NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium,

which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012." Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

10. The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

11. The Federal Register Notice states that "Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished." It is assumed that this includes the "High-Risk Excess Facilities" previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead "reallocated" to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: “The U.S. nuclear weapons infrastructure is aging and historically underfunded.” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

13. The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

14. Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

15. Then the “purpose and need” statement briefly notes: “LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

David Burtis  
dbsorbit@earthlink.net  
103 Jasmine Lane  
Calistoga, CA 94515

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Gavin Newsom  
Governor

Jared Blumenfeld  
Secretary for Environmental Protection

October 29, 2020

Undersecretary Lisa E. Gordon-Hagerty,  
National Nuclear Security Administration  
Forrestal Building  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Washington, DC 20585

**SUBJECT: Docket ID# NNSA FRDOC 0001-0079**

Dear Undersecretary Gordon-Hagerty:

The Office of the Secretary of the California Environmental Protection Agency ("CalEPA") and the Department of Toxic Substances Control ("DTSC") submit the present comments on the National Nuclear Security Administration's ("NNSA") Notice of Intent ("NOI") to Prepare a Site-Wide Environmental Impact Statement ("Current SWEIS") for Continued Operation of the Lawrence Livermore National Laboratory ("LLNL").<sup>1</sup>

CalEPA's mission is to restore, protect and enhance the environment, and to ensure public health, environmental quality and economic vitality. DTSC's mission is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. We therefore appreciate that Deputy Director Stuart Easson reached out to Governor Newsom's administration about this environmental review process.

We respect LLNL's responsibilities for "ensuring the safety, security, and reliability of the nation's nuclear deterrent" and for "respond[ing] to national security and global security concerns that range from nuclear proliferation and terrorism to energy shortages and climate change."<sup>2</sup> At the same time, we recognize that LLNL conducts work with significant public health and environmental implications, and it does so in one of the largest and most densely populated metropolitan areas in the country. Thus, it is particularly important that NNSA comply with the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA") when conducting environmental reviews for LLNL.

Department of Energy ("DOE") regulations "require preparation of site-wide documents for certain large, multiple facility sites, such as LLNL."<sup>3</sup> Nearly 15 years have passed since NNSA issued a record of decision for its last LLNL SWEIS ("Previous SWEIS"). The NOI provides notice that NNSA is considering a new SWEIS. It would be for a suite of activities for two sites – a 770-acre site in Livermore ("Livermore Site") and a 7,000-acre experimental test site ("Site 300") between Livermore

<sup>1</sup> 85 Fed.Reg. 47362 (August 5, 2020).

<sup>2</sup> 85 Fed.Reg. 47362.

<sup>3</sup> 85 Fed.Reg. 47363-47364.

and Tracy – over a 15-year planning period. After a thorough review of the NOI, we offer the comments below. Our comments encourage NNSA to develop the Current SWEIS in a manner that: (A) includes a fuller description of the proposed action; (B) addresses certain CEQA obligations; (C) sets forth a plan for affirmatively engaging environmental justice communities; and (D) analyzes certain potential impacts.

## **A. Description of Proposed Action**

The purpose of an NOI is to alert stakeholders that an agency is undertaking an environmental review process.<sup>4</sup> To that end, the Council on Environmental Quality’s (“CEQ”) NEPA regulations require an NOI to “[d]escribe the proposed action and possible alternatives.”<sup>5</sup> The NOI includes a description of the proposed action that is relatively general and provides limited notice. We recognize that NNSA is still at a preliminary stage of its environmental review and has stated its intention to provide more details in the Current SWEIS, but we encourage NNSA to provide details on the following issues in particular.

### **1. LLNL Mission**

The NOI describes the mission of LLNL as stewarding the nation’s nuclear stockpile and “respond[ing] to national security and global security concerns that range from nuclear proliferation and terrorism to energy shortages and *climate change*.”<sup>6</sup> The NOI then discusses specific aspects of this mission: weapons, lasers, biosecurity, counterterrorism, defense, energy, intelligence, and nonproliferation.<sup>7</sup> But it does not discuss the aspect of the mission focused on climate change. Out of respect for the environmental implications of LLNL’s work on climate change, we request that NNSA address that subject.

### **2. Baseline**

In the NOI for the Previous SWEIS, NNSA described LLNL’s priorities as including: “enhancing the nation’s energy security by developing and making available clean energy; cleaning up former nuclear weapons complex sites; finding more effective technology for minimizing, treating, and disposing of nuclear waste; and leveraging science and technology to advance fundamental knowledge and economic competitiveness.”<sup>8</sup> The NOI, however, does not discuss the cleanup of former nuclear weapons sites or technologies for disposal of nuclear waste.<sup>9</sup> We request that NNSA clarify the currently ongoing activities at LLNL, as those activities would determine the current environmental conditions against which NNSA would have to measure the potential impacts of the action alternatives in the Current SWEIS.

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<sup>4</sup> *Northwest Coalition for Alternatives to Pesticides (NCAP) v. Lyng* (9th Cir.1988) 844 F.2d 588, 594–95.

<sup>5</sup> 40 C.F.R. § 1508.22(a);

<sup>6</sup> 85 Fed Reg. 47362. (Emphasis added.)

<sup>7</sup> 85 Fed.Reg. 47363.

<sup>8</sup> 67 Fed.Reg. 41225.

<sup>9</sup> See 85 Fed.Reg. 47363.

### **3. Operational Activities**

The NOI is open-ended in its description of “Operational Changes.” It states that “Operational Changes” could include: (a) “Changes to material-at-risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the deinventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012”; and (b) “changes in various facility operations, which would be defined in the LLNL SWEIS, and may result in changes in generated wastes and shipments to disposal sites.”

This description does not specify whether the contemplated “changes” would result in increases or decreases in the amount of waste generated and transported to or from LLNL. It is so broad that it could entail radically different types of actions. The NOI states that NNSA will include more details in the Current SWEIS.<sup>10</sup> We expect that these details will provide a much fuller account of the contemplated changes.

#### **B. California Environmental Quality Act Obligations**

In the NOI, NNSA commits to conducting the environmental review for LLNL in accordance with NEPA and CEQA.<sup>11</sup> However, it fails to discuss certain critical CEQA obligations. In particular, the NOI does not: (1) describe the expected CEQA compliance approach; or (2) identify a lead agency and responsible agencies.

##### **1. CEQA Compliance Approach**

The NOI states that, in instances where the requirements of NEPA and CEQA differ, NNSA will comply with “whichever requirements are more stringent.”<sup>12</sup> But specific CEQA document types have varying requirements and actions to ensure fulfillment of joint NEPA/CEQA document approaches governed by Title 14 of the California Code of Regulations Section 15220-15229. If the NNSA seeks to encourage use of these efficiencies by state and local agencies, we request that it ensure that the methods implemented by the NNSA are consistent with these regulations.

##### **2. Lead and Responsible Agencies**

We request that the NNSA identify the lead agency under CEQA, if any has been identified. In addition, we request that the NNSA identify DTSC and CalEPA as responsible parties under CEQA.

LLNL is an onsite hazardous waste generator and is regulated by DTSC as an onsite hazardous waste treatment and storage facility. DTSC also permits hazardous waste Treatment, Storage, and Disposal Facility (TSDF) activities at LLNL Site 300. LLNL is also in the process of closing several former hazardous waste management units at the site, and it has submitted an application to DTSC

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<sup>10</sup> 85 Fed.Reg. 47364.

<sup>11</sup> 85 Fed.Reg. 47365 [“In addition to compliance with NEPA, the LLNL SWEIS will address requirements in the California Environmental Quality Act (CEQA), Public Resources Code Sec 21000 et seq.”].

<sup>12</sup> 85 Fed.Reg. 47365.

for renewal of its hazardous waste facility permit. It is unclear from the NOI what level of discretionary approval(s) from DTSC may be necessary, but we would appreciate further involvement and consultation with DTSC as the plan is developed to help identify where it may have discretionary actions, such as DTSC-specific permit modifications or cleanup actions.

### C. Outreach to Environmental Justice Communities

DOE's 2017 Environmental Justice Strategy ("2017 Strategy") identifies a goal of "Integrat[ing] Environmental Justice into the National Environmental Policy Act Process."<sup>13</sup> The strategy explains that "NEPA provides a process to engage minority and low-income communities, American Indian Tribes, and Alaska Natives in DOE's decision making, and to meaningfully evaluate potential health, cultural, and environmental impacts that could affect these communities."<sup>14</sup> While NNSA may be attempting to engage environmental justice communities through informal channels, the NOI includes no discussion of a plan for engagement.

Additionally, the 2017 Strategy refers to the DOE's role in developing the Federal Interagency Working Group on Environmental Justice NEPA Committee's report on Promising Practices for EJ Methodologies in NEPA Reviews ("EJ Methodologies").<sup>15</sup> The EJ Methodologies advise that, among other things, "[a]gencies may wish to conduct several small scoping meetings for minority populations and low-income populations to foster more participation and substantive discussions (e.g., community members may feel intimidated by large public meetings and formal discussions). If more than 15-20 people are in attendance, breaking into discussion groups may improve the effectiveness of the meeting."

NNSA should address these shortcomings by (a) developing a plan for engaging environmental justice communities; (b) committing to holding meetings specifically aimed at environmental justice communities; (c) committing to holding meetings in communities near transportation routes and disposal sites; and (d) committing to providing interpreters at meetings.

### D. Preliminary Environmental Analysis

The NOI includes a list of twenty-two issues that NNSA characterizes as having been "identified for analysis in the LLNL SWEIS."<sup>16</sup> It states that the list "is tentative and intended to facilitate public comment on the scope of the LLNL SWEIS."<sup>17</sup> The NOI invites "suggestions for the addition or deletion of items on the list."<sup>18</sup> We believe that the list marks an improvement on the list of issues featured in the NOI for the Previous SWEIS. We encourage NNSA to analyze all issues listed in the NOI – and certain additional details – as discussed in the comments below.

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<sup>13</sup> U.S. Department of Energy, Environmental Justice Strategy (Jan. 2017) (hereafter 2017 Strategy), ii, <[https://www.energy.gov/sites/prod/files/2017/01/f34/201708\\_EJStrategy.pdf](https://www.energy.gov/sites/prod/files/2017/01/f34/201708_EJStrategy.pdf)>.

<sup>14</sup> 2017 Strategy, *supra*, p. 15.

<sup>15</sup> 2017 Strategy, *supra*, p. 15. See also EJ Methodologies (Mar. 2016), <[https://www.epa.gov/sites/production/files/2016-08/documents/nepa\\_promising\\_practices\\_document\\_2016.pdf](https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf)>.

<sup>16</sup> 85 Fed.Reg. 47365.

<sup>17</sup> 85 Fed.Reg. 47365.

<sup>18</sup> 85 Fed.Reg. 47365.

## 1. Environmental Justice Impacts

The NOI requests comment on “Environmental Justice, particularly whether or not activities at LLNL have a disproportionately high and adverse effect on minority and/or low-income populations.” There is no question that low-income communities and communities of color bear disproportionately high environmental and public health burdens.<sup>19</sup> We urge NNSA to analyze – and mitigate – environmental justice impacts to the fullest extent possible.

In conducting its environmental analysis for the Current SWEIS, NNSA should consider the harms that would result from both onsite and offsite activities and the cumulative nature of those harms.<sup>20</sup> In addition, NNSA should follow the strategy set forth in the EJ Methodologies of “us[ing] a sliding-scale approach to ensure that the level of detail of the analysis of potential environmental impacts is commensurate with the potential for a proposed action and alternatives to affect minority populations and low-income populations, American Indian Tribes, and Alaska Natives.”<sup>21</sup>

## 2. Waste Disposal Impacts

The NOI identifies issues regarding radiological and hazardous waste, but these issues, as described in the NOI, do not expressly encompass the disposal of such waste. NNSA should commit to analyzing this issue. Such an analyses would, among other things, assess the locations where NNSA could dispose of radioactive waste and the potential public health impacts – particularly in environmental justice communities – along the transportation routes and near the ultimate disposal sites.

## 3. Groundwater Contamination Impacts

The NOI identifies as a potential issue for analysis “[i]mpacts on surface and groundwater, floodplains and wetlands, and on water use and quality.”<sup>22</sup> The groundwater and soil at Site 300 are already contaminated with solvents and other volatile organic compounds, tritium, uranium-238, high explosive compounds, nitrate, and perchlorate. In fact, since 1990, the U.S. Environmental Protection Agency has included Site 300 in its Superfund National Priorities List.<sup>23</sup> Given the existing

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<sup>19</sup> If NNSA would like data on environmental impacts in California generally or in the specific communities that could be affected by the action alternatives, CalEPA would be more than happy to provide it. Indeed, we believe that NNSA should include CalEPA as a responsible party in part because of CalEPA’s responsibilities related to environmental justice issues.

<sup>20</sup> Under CEQA, where there already is a high pollution burden on a community, the “relevant question” is “whether any additional amount” of pollution “should be considered significant in light of the serious nature” of the existing problem. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 661; see also *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025 [holding that “the relevant issue ... is not the relative amount of traffic noise resulting from the project when compared to existing traffic noise, but whether any additional amount of traffic noise should be considered significant in light of the serious nature of the traffic noise problem already existing around the schools.”].)

<sup>21</sup> EJ Methodologies, *supra*, p. 15.

<sup>22</sup> 85 Fed.Reg. 47365.

<sup>23</sup> EPA Superfund Site Identification No. CA

2890090002; see also LLNL Environmental Report 2018, EX-6, EX-7, <[https://saer.llnl.gov/saer18/saer\\_2018.pdf](https://saer.llnl.gov/saer18/saer_2018.pdf)>.

contamination, we request that LLNL closely analyze the potential cumulative effects that could result from the action alternatives considered in the Current SWEIS.

#### 4. Socioeconomic Impacts

The NOI identifies as a potential issue for consideration the “[s]ocioeconomic impacts to affected communities.”<sup>24</sup> We strongly encourage NNSA to analyze this issue. In doing this, NNSA should interpret “socioeconomic impacts” broadly. That term would, of course, encompass the economic consequences resulting from LLNL expenditures. However, “socioeconomic impacts” should also encompass the longer-term (and potentially broadly diffused) costs incurred as a result of public health and environmental impacts. In particular, it should account for the costs of medical care needed for health conditions resulting from the exposure of LLNL workers and the public to hazardous and radioactive waste.

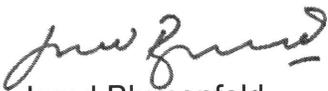
#### 5. Wildfire Impacts

The NOI identifies as a potential issue “[u]navoidable adverse impacts due to natural phenomena (e.g., floods, earthquakes, etc.).”<sup>25</sup> We encourage NNSA to circulate a supplemental NOI that commits to analyzing this issue and that expressly mentions wildfire as a phenomenon. In addition, NNSA should commit to addressing a related issue – the potential fire risks associated with the activities contemplated in the action alternatives. Due to climate change, California’s fire season has become longer and more severe. LLNL falls within a zone particularly susceptible to fires, and certain activities at LLNL have the potential to start, worsen, or be significantly impacted by fires. Therefore, the Current SWEIS would be incomplete if it did not analyze such potential impacts, including the impacts of a wildfire fire from outside of the facility on the hazardous materials within.

### CONCLUSION

We appreciate your consideration of these comments and look forward to continuing to participate in the environmental review process for the LLNL.

Sincerely,



Jared Blumenfeld  
Secretary for Environmental Protection



Meredith Williams  
Director, Department of Toxic Substances Control

Cc: Ms. Fana Gebeyehu-Houston, NEPA Document Manager

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<sup>24</sup> 85 Fed.Reg. 47365.

<sup>25</sup> 85 Fed.Reg. 47365.

**From:** [Concerned Citizens for Nuclear Safety](http://www.concernedcitizens.org)  
**To:** [ccns@nuclearactive.org](mailto:ccns@nuclearactive.org); [LLNLSWEIS](http://www.llnl.gov)  
**Subject:** [EXTERNAL] CCNS Scoping Comments for LLNL SWEIS  
**Date:** Wednesday, October 21, 2020 8:13:18 PM

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## Concerned Citizens for Nuclear Safety

P. O. Box 31147, Santa Fe, NM. 87594-1147

[www.nuclearactive.org](http://www.nuclearactive.org)

October 21, 2020

Ms. Fana Gebeyehu-Houston, NEPA Document Manager

National Nuclear Security Administration (NNSA)

Lawrence Livermore National Laboratory (LLNL)

P.O. Box 808, L-293

Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include *“Approximately 55 new facility construction projects...”* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

3. The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. In fact, the civilian science research must include ways to capture and contain the radioactive emissions more efficiently and effectively. Further, the SWEIS must analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced and/or eliminated, not increased.

6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium

limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

The NNSA must re-evaluate its decision not to conduct a SWEIS for the LANL site given its importance for increased plutonium pit production. The last SWEIS was completed in 2008. There are many changes at the LANL site that have not been properly addressed as required by NEPA.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers. The scope of the SWEIS must explore alternatives to open-air bomb blasts, including the availability of world-class confined blast equipment designed and manufactured by El Dorado Engineering. <https://www.eldoradoengineering.com/>. Exposing individuals, families and communities to open-air bomb blasts is unconscionable, irresponsible, and creates reckless endangerment to their health, their homes and environment. The civilian science research must include developing or adopting alternatives to open-air bomb blasts.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

The SWEIS must consider earthquake scenarios where special nuclear materials (SNN) escape Main Site facilities and Site 300 site. These analyses would determine the potential cost, effort, and planning needed to secure the SNM facilities in such earthquake scenarios.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.” It is assumed that this includes the “High-Risk Excess Facilities”* previously identified by

the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “*purpose and need*” for the review. In that section the NNSA claims: “*The U.S. nuclear weapons infrastructure is aging and historically underfunded.*” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “*is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.*” The SWEIS must analyze for why the funds received by the Lab haven't been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funding?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: “*LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.*” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive, hazardous, and toxic materials will be on site to accomplish the LEPs - and their disposal pathways. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time. The SWEIS must analyze the factors NNSA considered when launching NEPA reviews for plutonium pit production at Savannah River Site, Los Alamos National Laboratory, and Livermore during the global pandemic and their impact on public participation in the NEPA processes.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Joni Arends, Co-founder and Executive Director

Concerned Citizens for Nuclear Safety

P. O. Box 31147, Santa Fe, NM. 87594-1147

[ccns@nuclearactive.org](mailto:ccns@nuclearactive.org)

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**From:** [Barbara Cella](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Scope of the NNSA Site-Wide Environmental Statement for the Livermore Lab Main Site  
**Date:** Monday, October 5, 2020 8:27:08 PM

---

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Name: Barbara J Cella

Email (preferred for communications): [barbaracella@sbcglobal.net](mailto:barbaracella@sbcglobal.net)

Postal Address (provided for completeness): 128 Spinnaker Ct., Del Mar, CA 92014

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**From:** [Tom Clements](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Comment, Request on Scope of Draft LLNL SWEIS, by SRS Watch, August 27, 2020  
**Date:** Thursday, August 27, 2020 10:53:38 AM

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**August 27, 2020**  
**Ms. Fana Gebeyehu-Houston**  
**NEPA Document Manager**  
**National Nuclear Security Administration**  
**Livermore Field Office**  
**7000 East Avenue, L-293**  
**Livermore, CA 94550-9234**  
**[LLNLSWEIS@NNSA.DOE.GOV](mailto:LLNLSWEIS@NNSA.DOE.GOV)**

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING  
ON THE LAWRENCE LIVERMORE NATIONAL LAB (LLNL) SITE-WIDE ENVIRONMENTAL IMPACT  
STATEMENT**

**Connection between LLNL and Savannah River Site Plutonium/Pit Activities Must be Discussed  
in any Draft SWEIS; “Deterrence” Must be Clarified in Draft SWEIS**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020. (Notice posted here: <https://www.energy.gov/sites/prod/files/2020/08/f77/noi-eis-0547-llnl-site-wide-2020.pdf>)

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s anticipated budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb-grade materials that can be used (and stored) at Livermore Lab.

**Of specific interest to SRS Watch is the connections between plutonium storage and processing and new pit design at LLNL and the proposed pit-production plan for the proposed SRS Plutonium Bomb Plant at the DOE’s Savannah River Site here in South Carolina. In any draft SWEIS, all LLNL connections related to pit design and plutonium processing, transport and storage and SRS must be discussed.**

**Additionally, the Federal Register notice states: “The Weapons Program works to ensure that the nation’s nuclear deterrent remains safe, secure, and reliable.” It further states that “LLNL’s defining responsibility is ensuring the safety, security, and reliability of the nation’s nuclear deterrent.” The draft SWEIS must define the word “deterrent.” Use of this term may not be accurate as the current stockpile and anticipated new nuclear weapons may well comprise a nuclear war-fighting force far beyond any deterrence level. This point must be clarified.**

In “normal” times, the Federal Register Notice would establish a public comment period that is far too

short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2). But these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This "hurry up" schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on "Main Street," and, often, children who are doing distance learning from home. Such a schedule is not acceptable.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab's Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

The things above and more severely limit the public's capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

Therefore, I request:

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to this request.*

Thank you for your consideration of these comments and requests. I look forward to your response to my requests. Please confirm receipt of this message.

Sincerely,  
 Tom Clements  
 Director, Savannah River Site Watch  
 Columbia, SC  
 srswatch@gmail.com  
<https://srswatch.org/>

\*\*\*\*\*

This message does not originate from a known Department of Energy email system. Use caution if this message contains attachments, links or requests for information.

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**From:** [Tom Clements](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Comments on Scoping for LLNL SWEIS - by SRS Watch, Oct. 5, 2020  
**Date:** Monday, October 5, 2020 6:39:23 AM

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October 5, 2020

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

**I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.**

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

Please confirm receipt of these comments for the LLNL SWEIS scoping record.

**As I monitor Savannah River Site (SRS) issues, I request that any connection between LLNL and SRS be covered in the SWEIS. This includes any shipment of material, including plutonium, from LLNL to SRS (or via an intermediary site such as Los Alamos) and any exchange of information or staff in planning for the proposed SRS Plutonium Bomb Plant (for plutonium pit production) and for "plutonium disposition." The role of LLNL in planning for pit production and disposition of surplus plutonium at SRS and Los Alamos must be made clear in the SWEIS.**

**To be clear – will any additional plutonium be shipped from LLNL to SRS for any reason? If so, what would be the source of that plutonium and the reason for its shipment?**

Additionally, these issues must be covered in the SWEIS:

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
2. The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
3. The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "*Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.*" NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.
6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "*Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.*" Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.
7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.
8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.
9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.
10. The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.
11. The Federal Register Notice states that "*Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.*" It is assumed that this includes the "High-Risk Excess Facilities" previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be

used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

13. The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

14. Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

15. Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Tom Clements

Director, Savannah River Site Watch

1112 Florence Street

Columbia, SC 29201

<https://srswatch.org/>

[srswatch@gmail.com](mailto:srswatch@gmail.com)

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**From:** [Douglas Daetz](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for extension of public comment period  
**Date:** Tuesday, September 1, 2020 12:22:17 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

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For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

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Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

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3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

Douglas Daetz  
1744 Karameos Drive  
Sunnyvale, CA 94087

[douglas.daetz@aya.yale.edu](mailto:douglas.daetz@aya.yale.edu)

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**From:** [Tina Darmohray](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [Wilson, Scott F](#); [Charles Marker](#)  
**Subject:** [EXTERNAL] LLNL SWEIS  
**Date:** Wednesday, September 16, 2020 8:41:11 PM

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Hello,

We live at 2548 Greenville Road, Livermore, CA 94550.

As a Laboratory Neighbor, we have been contacted re: the upcoming SWEIS for LLNL. We attended the public online meeting and submitted our comments. We are submitting them here, again, for the written record.

Recently, LLNL has constructed new buildings directly across from our property. These buildings have air handling systems that emit noise pollution which significantly negatively impacts us. The systems run continuously and can be heard even inside our house. We have been in contact with Scott Wilson, of LLNL, re: this problem for more than a year. This summer, we worked through Scott to have LLNL facilities turn down the air handling systems for the afternoon of July 18, 2020 since we had to host our family for our daughter's Covid-cancelled wedding and we wanted to be able to hear their ceremony over the new-normal roar of the LLNL building air handling systems. We appreciate the accommodation for our daughter's wedding, and would like to have a permanent solution for this ongoing problem and want it addressed in the Environmental Impact Statement.

Respectfully,

Tina Darmohray  
Charles Marker  
Former LLNL employees and Lab Neighbors

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**From:** [Marlene DeNardo](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT AND A SECOND PUBLIC MEETING  
**Date:** Thursday, August 27, 2020 7:19:15 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

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4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

Thank you for your consideration of my request. I look forward to your response.

*Marlene DeNardo marlenedenardo@sbcglobal.net*

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**From:** [BARBARA DYSKANT](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for Extension of Public Comment Period and Second Meeting on LLNL SWEIS  
**Date:** Wednesday, September 2, 2020 5:17:40 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

This matters to me as a mother and hopefully soon grandmother, as a former long-term resident of the Livermore area, and recognizing that this will affect all of us everywhere. We need more time to get the word out to include the opinions of all involved; there is simply not enough time to do it justice with the timetable currently set cutting off the public comment period on September 21st, and holding just one public meeting on Sept 2nd.

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**Signed,**

**Name: Barbara Dyskant**

Email and/or postal address: [bdyskant@dmstars.net](mailto:bdyskant@dmstars.net), Barbara Dyskant, 3624  
Jollytown Road, Hinsdale NY 14743

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**From:** [Roger Eaton](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Livermore Lab Site-Wide Environmental Impact Statement  
**Date:** Monday, October 19, 2020 2:31:53 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

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Sincerely,

**Roger Eaton**

[rogerweaton@gmail.com](mailto:rogerweaton@gmail.com)

**355 Serrano Dr Apt 4F**

**San Francisco, CA 94132**

--Roger Eaton

+1 415 933 0153

[Bringing the Goals of the UN Home to San Francisco](#) - not just for Bay Area folks.

[Voices of Humanity](#) <-- **In the conversation between the communities of Planet Earth,** women and men will use their collective voices to persuade the nations to cooperate. A kindly and intelligent human unity with gender equality (and diversity) built-in is ours for the taking!!! Your participation could make the difference.

[Book of Job - Order Out of Chaos](#) - translated by Roger Eaton as a play. Great story. Great poetry.

\*\*\*\*\*

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**From:** [Judith Favor](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Scoping at LLNL  
**Date:** Monday, October 19, 2020 2:13:26 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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Sincerely,  
Judith Favor  
616 Leyden Lane  
Claremont CA 91711

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website: [JudithFavor.com](http://JudithFavor.com)

Author of:  
*Friending Rosie: Respect on Death Row*  
(Page Publishing, early 2021)

*52 Weeks of Love and Money: A Companion Journal to Sabbath Economics*  
(Reader's Magnet, late 2020)

*Sabbath Economics: A Spiritual Guide Linking Love with Money*  
(Reader's Magnet, November 4, 2020 )

*The Beacons of Larkin Street* (2017)  
*Silent Voices* (2014)  
*The Edgefielders* (2013)  
*Spirit Awakening: A Book of Practices* (co-author, 1988)

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**From:** [Stu](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS)  
**Date:** Monday, October 5, 2020 11:38:30 AM

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Sincerely,

Stu Fine

[stufine@gmail.com](mailto:stufine@gmail.com)

3309 Streamside Cir #207, Pleasanton CA 94588

\*\*\*\*\*

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**From:** [JoAnn Frisch](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Comments on the scope of the NNSA's SWEIS for continued operation of Livermore Lab's Main Site and Site 300, Tracy, CA  
**Date:** Thursday, October 15, 2020 12:20:58 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "*Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.*" NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.
6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "*Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.*" Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.
7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.
8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the *“High-Risk Excess Facilities”* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *“purpose and need”* for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on

the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Jo Ann Frisch**

**[Email: joannfrisch@sbcglobal.net](mailto:joannfrisch@sbcglobal.net)**

**Postal: 3231 Vineyard Ave. #110,**

**Pleasanton, CA 94566**

\*\*\*\*\*

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**From:** [dfgassman@aol.com](mailto:dfgassman@aol.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Lawrence Livermore National Laboratory  
**Date:** Monday, August 31, 2020 2:46:27 PM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This "hurry up" schedule is happening at the very time we the public must deal

with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

David Gassman

389 Belmont Street #111

(1/2 block from Grand Ave between Perkins & Staten)

Oakland, CA 94610

Home: 510-835-2334

[DFGassman@aol.com](mailto:DFGassman@aol.com)

\*\*\*\*\*

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**From:** [dfgassman@aol.com](mailto:dfgassman@aol.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Scope of NNSA's Site-Wide Environmental Impact Statement  
**Date:** Monday, October 5, 2020 12:46:30 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully

considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

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**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "*Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.*" Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail

all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that "*Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.*" It is assumed that this includes the "High-Risk Excess Facilities" previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead "reallocated" to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of "purpose and need" for the review. In that section the NNSA claims: "*The U.S. nuclear weapons infrastructure is aging and historically underfunded.*" Yet, there have been substantial budget increases for NNSA and its weapons labs during both the

Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “*is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.*” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: “*LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.*” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic

period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

David Gassman

389 Belmont Street #111

(1/2 block from Grand Ave between Perkins & Staten)

Oakland, CA 94610

Home: 510-835-2334

[DFGassman@aol.com](mailto:DFGassman@aol.com)

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**From:** [dfgassman@aol.com](mailto:dfgassman@aol.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Lawrence Livermore National Laboratory  
**Date:** Friday, September 18, 2020 11:25:41 AM

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Replying for both of us & noting that 30 days is not 120 days.

-----Original Message-----

From: LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)>  
To: [dfgassman@aol.com](mailto:dfgassman@aol.com) <[dfgassman@aol.com](mailto:dfgassman@aol.com)>  
Sent: Fri, Sep 18, 2020 11:16 am  
Subject: RE: [EXTERNAL] Lawrence Livermore National Laboratory

Dear Ms. Seffens,

Thank you for your comment. In response to the California wildfires and evacuations and the requests from the public, the NNSA is extending the public scoping period on the Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations of the Lawrence Livermore National Laboratory in Livermore, California, by 30 days. The Notice of Intent for this SWEIS was originally published in the *Federal Register* on August 5, 2020, (85 FR 47362). The public scoping period will now end on October 21, 2020.

In addition, NNSA will host a second public scoping meeting on October 5, 2020 from 6:00 – 7:30 pm PDT. Due to the ongoing response to the COVID-19 pandemic and in compliance with evolving state and local instructions regarding social distancing, NNSA will be conducting the scoping period for this SWEIS primarily via the internet. Information about LLNL, the SWEIS, the additional public scoping meeting and how the general public can submit comments during the scoping process is available online at:

<https://www.energy.gov/nnsa/nnsa-nepa-reading-room>.

Sincerely,

Fana Gebeyehu-Houston  
NEPA Document Manager  
Livermore Field Office

---

**From:** LLNLSWEIS

**Sent:** Tuesday, September 01, 2020 8:23 AM

**To:** [dfgassman@aol.com](mailto:dfgassman@aol.com)

**Subject:** RE: [EXTERNAL] Lawrence Livermore National Laboratory

Dear Ms. Seffens,

I just responded to Mr. Gassman via this email address, but I wanted to acknowledge your input individually as well. I am writing to acknowledge that the National Nuclear Security Administration's (NNSA) Livermore Field Office has received your email. Thank you for your input. We will be reviewing your suggestions carefully and will reply to you as soon as possible. We look forward to working with you and other stakeholders as we prepare a new Site-wide Environmental Impact Statement (SWEIS) for Lawrence Livermore National Laboratory. For immediate reference the date and time of the meeting is Wednesday, September 2, 2020 at 6pm Pacific Daylight Time and can be also accessed at the link in the Federal Register announcement.

Sincerely,

Fana Gebeyehu-Houston  
NEPA Document Manager  
Livermore Field Office

**From:** [dfgassman@aol.com](mailto:dfgassman@aol.com) [<mailto:dfgassman@aol.com>]

**Sent:** Monday, August 31, 2020 10:56 PM

**To:** LLNLSWEIS <llnlsweis@nnsa.doe.gov>

**Subject:** [EXTERNAL] Lawrence Livermore National Laboratory

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A  
SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE  
ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

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The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

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recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

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All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

Patricia H. Seffens  
389 Belmont Street #111  
Oakland, CA 94610  
Home: 510-835-2334  
[DFGassman@aol.com](mailto:DFGassman@aol.com)

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**From:** [B. Geary](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST EXTENSION OF PUBLIC COMMENT PERIOD & 2ND PUBLIC MEET ON LLNL Site-wide EIS  
**Date:** Thursday, August 27, 2020 6:53:32 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. **The Federal Register Notice states that the public comment period is for a SCANT 45-days and will close on September 21, 2020.**

**Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting**, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post an easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the **public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,***
2. *That a **second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and***
3. *That the **second online public meeting will be publicized well in advance of the date it will be held, and***
4. *That the **NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.***

**Signed,**

**Name: B. A. GEARY**

**Email and/or postal address: [bgearyread@gmail.com](mailto:bgearyread@gmail.com)**

\*\*\*\*\*

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**From:** [Kenneth Gibson](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE EIS  
**Date:** Sunday, August 30, 2020 5:53:41 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

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**Therefore, I request:**

- 1. That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
- 2. That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, or next year and*
- 3. That the second online public meeting will be publicized well in advance of the date it will be held, and*
- 4. That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Kenneth Gibson [kennethgibson@gmail.com](mailto:kennethgibson@gmail.com)**

**Email and/or postal address:**

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This message does not originate from a known Department of Energy email system. Use caution if this message contains attachments, links or requests for information.

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**From:** [Joan Goddard](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Lawrence Livermore NL Site-Wide EIS comment  
**Date:** Sunday, October 4, 2020 11:20:31 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions." Therefore, I ask that the analyses I am requesting be fully undertaken - and my questions fully answered - in the SWEIS.

1. **The SWEIS should analyze an alternative future for Livermore Lab;** one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. **It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities** - and decision makers and the public alike will have these facts in hand when making decisions.

2. The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "Approximately 55 new facility construction projects" **The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.**

3. The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. **Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.**

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. **The SWEIS must consider worker**

**health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.**

5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "Operational changes - Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios." NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. **The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.**

6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012." Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. **There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.**

7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? **In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.**

8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. **A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.**

9. **The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300.** Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

10. The SWEIS must fully consider the impacts of climate change. On the one hand, **it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme**

**weather events related to climate change on the Livermore Lab itself.** In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. **These types of events may increase in severity and frequency in the coming 15 years.**

11. The Federal Register Notice states that "Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished." It is assumed that this includes the "High-Risk Excess Facilities" previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. **Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead "reallocated" to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.**

12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of "purpose and need" for the review. In that section the NNSA claims: "The U.S. nuclear weapons infrastructure is aging and historically underfunded." Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to "modernize" is 50% higher than when President Trump took office. In the context of these funding increases, **the SWEIS should fully review assertions in the Federal Register Notice that the Lab "is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition." Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?**

13. **The "purpose and need" statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should question the "need" for capabilities at Livermore Lab that might be duplicative of other NNSA sites.**

14. Further, the "purpose and need" statement for the SWEIS is heavily dependent on the Trump Administration's controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. **A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS "purpose and need" should not be driven by the Trump NPR, which in any event is a policy document and not a law.**

15. Then the "purpose and need" statement briefly notes: "LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons." This statement is left to stand without further explanation of what "testing" and "maintenance" entail. Yet, **it is precisely the weapons work covered by that sentence that will create "significant impacts to the environment."** The SWEIS needs to detail the scope and timeframes of the Life

**Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent - and in what quantities - radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.**

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Name: Joan Goddard

Email (preferred for communications): [joan@rujo.org](mailto:joan@rujo.org)

Postal Address (provided for completeness):

1171 West Latimer Avenue

Campbell CA 95008

\*\*\*\*\*

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October 4, 2020

Re: Public comment to NNSA

Dear Ms. Fana Gebeyehu-Houston:

We are submitting this public comment letter to outline important issues, questions and topics that the National Nuclear Security Administration (NNSA) must address in the upcoming Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosive testing range near Tracy, CA.

More than 2,000 current and former Livermore Lab employees have applied through the Labor Department for compensation for serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety. Further, the document must analyze past worker exposures when contemplating further operations with these potentially deadly materials.

The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "Operational changes - Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios." NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. And the emission (release) limits for all hazardous materials should be reduced, not increased.

The NNSA "scoping Meeting" slides on the SWEIS state that it will include "approximately 55 new facilities construction projects...". The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. In this context, we note that the NNSA states that this SWEIS will guide activities at Livermore Lab for the next 15 years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities - and decision makers and the public alike will have these facts in hand when making decisions.

The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Site 300 high explosive testing range near Tracy was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Then locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or clean up underway.

As residents of the Central Valley, we are particularly concerned about Livermore Lab's plan to increase the size and weight of open-air bomb blast at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These high explosive detonations involve more than 100 chemically hazardous contaminants. A future alternative that forgoes outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS.

The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of August/September Site 300 had to be evacuated for a time due to the proximity of the SCU Lightening Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

We want to acknowledge that NNSA extended the public comment period by 30-days (from September 21, 2020 to October 21, 2020). We appreciate this additional time. We would ask that the comment period be further extended for another 90-days during this period of pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public at this time.

We appreciate this opportunity to provide input into the Livermore Lab SWEIS. Our preferred method for all notices involving this SWEIS is by email.

Please provide links as they become available, including but not limited to the Draft SWEIS which is anticipated to be completed in spring/summer of 2021.

Sincerely,

Manteca Democratic Club  
[mantecademclub@gmail.com](mailto:mantecademclub@gmail.com)  
PO Box 242, Manteca, CA 95336

## MY COMMENT LETTER ON THE SCOPE OF THE SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT (SWEIS) FOR THE LAWRENCE LIVERMORE NATIONAL LABORATORY

By email to:

[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager, National Nuclear Security Administration (NNSA), Lawrence Livermore National Laboratory (LLNL), P.O. Box 808, L-293, Livermore, CA 94551-0808

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Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

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- 2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.
- 4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
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the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

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- 8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.
- 9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.
- 10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.
- 11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.
- 12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?
- 13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Name: Susan Goodman**

**Email (preferred for communications): [sagoodman@comcast.net](mailto:sagoodman@comcast.net)**

**Postal address (for completeness): 1273 Birchbrook St., Manteca, CA 95336**

October 4, 2020

Re: Public Comment to NNSA

Dear Ms. Fana Gebeyehu-Houston,

My name is Susan Goodman. As a resident of Manteca, CA I am terribly concerned about the impact of changes proposed by the National Nuclear Security Administration (NNSA) regarding the continued operation of Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosive testing range near Tracy, CA. I am requesting that the NNSA address the many concerns in the Site-Wide Environmental Impact Statement (SWEIS).

One of these concerns is the impact on Climate Change. The SWEIS must analyze the contribution of emissions to this global problem. Fires and other extreme weather are of further concern regarding the agencies decisions. In August and September of this year (2020) Site 300 had to be evacuated due to its proximity to the SCU Lightening Complex Fire. We all know that these events are becoming more frequent and more intense. The decisions made by SWEIS will serve as regulation for at least 15 years. It is imperative that SWEIS consider the probability of extreme weather and unhealthy air issues. Forward thinking is critical.

QUESTION: Has there been or will there be any analysis regarding the impact of emissions on Climate Change? Any analysis must be current.

The SWEIS should be looking at alternative uses for the Livermore Lab. Unclassified scientific research would be much more in keeping with the needs and concerns of the surrounding communities. The impact of civilian science research would be much more acceptable than the impact of nuclear weapons research.

QUESTION: Is there any current consideration for alternative uses for the Livermore Lab? Do you see any such consideration in the near future?

Again, this SWEIS will govern activities at Livermore Lab for the next 15 or more years. It is imperative that the agency analyze safe alternatives.

Sincerely,

Susan Goodman  
sagoodman@comcast.net

**From:** [Robert Gould](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for Extension of Public Comment Period for LLNL SWEIS  
**Date:** Monday, August 31, 2020 1:54:53 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

Dear Ms Gerbeyehu-Houston,

I am writing you in my capacity as President of San Francisco Bay Physicians for Social Responsibility, representing the hundreds of health professionals in the SF Bay Area concerned about the continued dangers of nuclear weapons in general, and in particular, ongoing and proposed plans of the DOE to embark on a new program of modernizing and increasing the lethality of our nuclear weapons arsenal, including continued and potentially expanded programs at Lawrence Livermore National Lab (LLNL).

The National Nuclear Security Administration and LLNL have begun a public process to receive input on the scope of a new LLNL or Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial, and ultimately catastrophic for planetary survival.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name:**  
**Robert M. Gould, MD**  
**President**  
**San Francisco Bay Physicians for Social Responsibility**

**Email and/or postal address:**

**rmgould1@yahoo.com**

**311 Douglass Street**  
**San Francisco, CA 94114**

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October 21, 2020

Sent by Email to: [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Re: Comments by Robert M. Gould, MD, President of San Francisco Bay Physicians for Social Responsibility on scope of the National Nuclear Security Administration's Site-Wide Environmental Impact Statement (SWEIS) to analyze operations at the Livermore Lab's Main Site in Livermore and its Site 300 near Tracy, CA over the next 15 years or more.

My name is Dr. Robert M. Gould, MD. After working as a Pathologist for over 30 years at Kaiser Hospital San Jose, since 2012 I've been an Associate Adjunct Professor in the Program on Reproductive Health and the Environment at the UCSF School of Medicine. Since 1993, I've been on the National Board of Physicians for Social Responsibility (PSR), serving twice as President in 2003 and 2014, and since 1989 I've also been President of San Francisco Bay PSR, for which I'm submitting comments today. Representing many hundreds of health professionals, PSR seeks to protect the health of our patients and communities, here and throughout the planet, from the ever-present dangers of nuclear weapons, by moving towards their abolition as quickly as possible.

I'd first like to address the problematic issues of the SWEIS time-frame, illustrated by the limited time imposed for thoughtful public comments at a time of a now second-wave of COVID-19, overlaid with the current, and unfolding wildfire situation. In this context, the scoping process cannot possibly provide optimal representation of communities potentially most impacted and vulnerable to the range of Lawrence Livermore National Lab (LLNL) - related activities, exemplified by the recent need to evacuate the Site 300 High Explosive Testing Range near Tracy because of the wildfire dangers. As such, SF Bay PSR strongly supports community demands to add a minimum of an additional 90 days for further public comment, and to urge you to more optimally extend that period until our pandemic subsides to the point that would allow in-person meetings to be conducted safely.

Beyond that, we at PSR have fundamental objections to the pre-imposed limits on public comments and discourse, whereby our ability to call for the complete closure and decontamination and decommissioning of the Livermore Site or Site 300 to most speedily eliminate the existential threat of nuclear weapons is considered from the onset in the SWEIS as "unreasonable," despite our civilization's imperative need to fully address our climate emergency, present and future pandemics that are undermined by continued programs of modernizing, and making our nuclear arsenals more lethal, at tremendous squandering of our resources towards such destructive ends.

As such, we register our opposition to the entire nuclear weapons program, of which LLNL plays such a key role, for which our government will be spending anywhere from an estimated \$1.2 to \$1.6 trillion over the next 30 years, translating to approximately \$4 to \$6 million every hour over the same period.

From that starting point, recognizing the Orwellian presets you have proposed for our comments, PSR opposes any expanded operations defined under the "Proposed Action Alternative," and would call for maximally achievable reduced operations apparently allowed to be considered under the "No Action Alternative."

This position is consistent with our understanding that a major justification offered by the NNSA for expanding operations and associated budgets is at the onset based on a flawed premise that “The U.S. nuclear weapons infrastructure is aging and historically underfunded.” In fact, under the Obama administration there were budget increases for NNSA and the weapons labs, followed by more substantive increases under the Trump administration. Now we see proposals for the coming fiscal year whereby NNSA has requested \$15.6 billion, and LLNL has requested \$2.2 billion for nuclear weapons activities, with LLNL claiming that it “is in need of facilities and infrastructure investments” because “half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” We would appreciate clarification on the criteria and metrics used to assess current facilities as requiring further expenditures, and simultaneously question why existing massive budgets have not been used to adequately maintain existing infrastructure.

We recognize that at the heart of the proposal for expanded operations is the 2018 Nuclear Posture Review that calls for a costly new generation of nuclear weapons facilitated by proposed LLNL “Life Extension Programs” involving currently unclear modalities to test and maintain nuclear weapons. As such, we regard as especially dangerous LLNL’s designation as being the lead lab for the development of the novel W87-1 warhead, which itself will require a new plutonium core unlike anything in the stockpile or in storage, requiring, per NNSA testimony to Congress, expanded plutonium bomb core production at the Savannah River Site in South Carolina and the Los Alamos Lab in New Mexico. We note as well that NNSA and LLNL are seeking to utilize the process to increase the amount of nuclear bomb grade plutonium that the Lab will be authorized to handle, use in experiments, and store at its Main Site in Livermore. This proposal raises the dangers of future potential contamination of the local environment superseding prior legacy contamination, including groundwater aquifers that caused the LLNL Main Site and Site 300 to be designated Superfund sites, posing threats to public and environmental health for decades to come.

While more plutonium at LLNL could significantly compound environmental burdens to present and future generations, we note that according to the draft, that over the 15-year LLNL SWEIS planning horizon, “NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.” We expect this includes the “High-Risk Excess Facilities” that have been identified by the Department of Energy Inspector General, but probably as well many more facilities that pose a risk to workers and the general public living and working near the Lab. In addition to wanting more details about the decontamination plans, we would also want information as how they would be funded, as the \$109 million funding that was supposed to be used to start some of this work in the coming year instead got allocated to nuclear weapons projects at the Lab.

Overall, we at PSR have fundamental questions about the alleged purposes of the U.S. Nuclear Weapons Program that claims to ensure that the nation’s nuclear “deterrent” remains “safe, secure, and reliable.” While we understand that any remaining lethal weapons in our stockpile need to be guaranteed to be able to avoid the dangerous scenarios well documented in Eric Schlosser’s “Command and Control” and similar chronicles documenting significant legacy safety issues and accidents involving our stockpiles and delivery systems that put our own population at significant risks over the last seven decades, true “safety” would reside in eliminating these weapons once and for all. And we must take responsibility for not obfuscating the fact that when we are referring to “reliability,” if not employing the usual “Newspeak” of our nuclear weapons establishment, that we are really talking about increasing our weapon’s ability to decimate our human civilization, either through the direct targeting of populations throughout the globe, or through the delayed impacts of expected nuclear winter and global malnutrition that might follow even limited nuclear exchanges, as predicted by numerous studies over the last two decades.

Anything that moves us to speedily eliminate global nuclear arsenals through international collaborative efforts, starting with our own national commitment to disarmament, and halting our plans for additional, more lethal weapons anticipated in this SWEIS is our only "reasonable" alternative to the manifold dangers inherent in all plans to continue our suicidal nuclear age at the peril of the future of our civilization.

Sincerely,

A handwritten signature in cursive script that reads "Robert M. Gould, MD".

Robert M. Gould, MD  
President  
San Francisco Bay Physicians for Social Responsibility

311 Douglass Street  
San Francisco, CA 94114  
[rmgould1@yahoo.com](mailto:rmgould1@yahoo.com)

*Please note that my preferred method for all notices involving the SWEIS is by email, provided above. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.*

**From:** [Caren Gould](#)  
**To:** [LLNL SWEIS](#)  
**Subject:** [EXTERNAL] THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT: REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD  
**Date:** Tuesday, September 1, 2020 1:24:08 PM

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## REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT

Dear, Ms. Fana Gebeyehu-Houston,

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

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If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This "hurry up" schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on "Main Street," and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab's Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public's capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

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3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, Caren Gould, MD**

**Name: Caren Gould, MD**

**Email and/or postal address: [careng1@gmail.com](mailto:careng1@gmail.com)**

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**From:** [Norma J F Harrison](#)  
**To:** [LLNSWEIS](#)  
**Cc:** [Tri-Valley Cares](#)  
**Subject:** [EXTERNAL] give a 90 day extension  
**Date:** Wednesday, September 2, 2020 3:52:22 PM

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Give a 90 day extension for a deep conversation about your intent to expand.

Meanwhile, consider Beirut.

Meanwhile consider nuclear waste lasts virtually forever – though not as long as petroleum based plastic

showing that you people are out of touch – except for pocketbook\$.

Norma J F Harrison 1312 Cornell Ave., Berkeley, Ca. USA 1 510 526 3968  
normaha@pacbell.net

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**From:** [Donald Helm](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS  
**Date:** Monday, October 5, 2020 6:18:06 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

As a LLNL retiree and former group leader in K Division of the Geohydrology and Environmental Studies Group, I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include *“Approximately 55 new facility construction projects...”* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency’s Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and

radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

**5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the

environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightening Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of

Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

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policy document and not a law.

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The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Donald C. Helm, Ph.D., CPEng, FGSA, FIEAust

Email (preferred for communications):

[donaldhelm@gmail.com](mailto:donaldhelm@gmail.com)

Postal Address (provided for completeness):

D.C. Helm

1413 Bolton Street

Baltimore, MD 21217-4202

\*\*\*\*\*

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**From:** [Winston Ho](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Regarding the environment impact to the local residents in the Bay area  
**Date:** Tuesday, October 6, 2020 10:37:26 PM

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Document Manager, National Nuclear Security Administration (NNSA), Lawrence Livermore National Laboratory (LLNL), P.O. Box 808, L-293, Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "*early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.*" Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

- 1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
- 2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "*Approximately 55 new facility construction projects...*" The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.
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(release) limits for all hazardous materials should be reduced, not increased.

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**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

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**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightening Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

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Sincerely,

**Name:** winston ho

**Email (preferred for communications):** [winstonhoalphaomega@gmail.com](mailto:winstonhoalphaomega@gmail.com)

**Postal address (for completeness):** 2144 Thayer Ave. Hayward, Ca. 94545



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**From:** [Carolyn Trupti Israel](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Alternative Future for Livermore Lab  
**Date:** Friday, October 16, 2020 5:09:53 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Name: Carolyn Trupti Israel**

**Email (preferred for communications): [cappy@baymoon.com](mailto:cappy@baymoon.com)**

**Postal Address (provided for completeness): 260 High St. - 204 Santa Cruz, CA 95060**

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October 2, 2020

National Nuclear Security Administration (NNSA) Lawrence Livermore National Laboratory  
(LLNL) P.O. Box 808, L-293 Livermore, California 94551-0808

Dear Ms. Fana Gebeyehu-Houston,

I am Robin Jones and reside in Manteca. I am writing you today because I am very concerned about the NNSA addressing the upcoming Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site Livermore, California and Site 300 high explosives testing range near Tracy, California.

As stated on the Department of Labor website, more than 2,000 current and former employees have applied through the Department of Labor for compensation for serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS MUST consider worker health and safety. Further, the document must analyze past worker exposures when contemplating further operations with these potentially deadly materials.

Do you have plans to analyze how workers health will be affected if there is an of expansion of the use of potentially deadly materials?

As you know, the Livermore Lab Main Site was place on the Environmental Protection Agency's Superfund list as one of the most contaminated sites in the nation in 1987. The Site 300 high explosives testing range near Tracy was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into the soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have clean-up activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

In addition, the SWEIS must consider the latest data from the United States Geological Survey on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater earthquake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

I do want to acknowledge that the NNSA extended the public comment time frame (30 days) from September 21, 2020 to October 21, 2020. However, I would ask that the public comment time frame be extended to at least another 90 days during this distressing time of a global pandemic, statewide fires and all the other additional stressors affecting so many people at this time that make public comments particularly challenging for citizens to participate.

I do appreciate the opportunity to provide input into the Livermore Lab SWEIS. I would prefer my communications involving the SWEIS to be by email.

Please provide the links as they become available, including but not limited to the DRAFT SWEIS, which is anticipated to be completed in the spring or summer of 2021.

Sincerely,

Robin Jones

[Robin9165@att.net](mailto:Robin9165@att.net)

1467 Chestnut Hill Drive

Manteca, California 95336

**From:** [Marylia Kelley](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Re: LLNL SWEIS Request for Public Comment Extension & Second Meeting  
**Date:** Wednesday, August 26, 2020 1:51:02 PM

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I just noticed a “day of the week” typo. The sentence below should read:

"...In this regard, I would point out that the online public meeting is scheduled very soon – on this coming Wednesday [September 2, 2020]."

Thank you. —Marylia Kelley

On Aug 25, 2020, at 12:51 PM, Marylia Kelley <[marylia@earthlink.net](mailto:marylia@earthlink.net)> wrote:

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),

Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)  
sent by email August 25, 2020

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD TO 120-DAYS AND**

**FOR A SECOND PUBLIC MEETING FOR “SCOPING” RE: THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT (SWEIS)**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new LLNL Site-Wide Environmental Impact Statement, which is being prepared pursuant to the National Environmental Policy Act (NEPA).

The Notice of Intent to prepare a new SWEIS was published in the Federal Record this month, on August 4, 2020. I saw it sometime after that date. The Notice states that the public comment period is for a scant 45-days and will close this coming month, specifically on September 21, 2020. Further, the Notice does not publicize any date and time for a virtual, online public scoping meeting, but states only that *when* such a meeting is scheduled a note will be placed on the NNSA website at [www.energy.gov/nnsa/nnsa-nepa-reading-room](http://www.energy.gov/nnsa/nnsa-nepa-reading-room).

The Notice in the Federal Register further states that the “meeting details will be announced in local media outlets.” One of Tri-Valley CAREs’ Tracy members emailed me a couple days ago saying she had just seen a “box” with the hearing notice published in the Tracy Press. I haven’t yet seen any such official notice in the Livermore paper of record, the Independent. The most recent edition of the

Independent did contain a short article. In this regard, I would point out that the online public meeting is scheduled very soon – on this coming Monday.

The Notice in the Federal Register states that the Livermore Lab is a multi-program, more than \$2 billion dollar a year enterprise involving two physical locations in Alameda and San Joaquin Counties. I would note, too, that 88.7% of Livermore Lab's fiscal 2021 funding request is for nuclear weapons activities, which are inherently complex and controversial.

Thus, even in the best of times this would constitute a too short public comment period with a too little publicized public meeting that is being held too soon after its announcement.

And, these are not the best of times.

As I type this request for an extension of the comment period to 120-days (from the August 4, 2020 Federal Register Notice) and for a second public meeting, the biggest fire threatening my community and other surrounding communities – the SCU Complex Fire - has just been declared the largest in the state of California, having burned about 364,000 acres since August 15th. The SCU Complex fire is the largest – but not the only - is only fire burning across the state right now.

The SCU Complex fire is only 15% contained. CalFire is offering no estimate for how long it may yet burn or how many acres it may yet consume.

Notably, last week one of the two LLNL locations that is the subject of this SWEIS, Site 300, was placed in “safe shutdown” and fully evacuated due to the immanent danger posed by this fire. The SCU Complex Fire has already destroyed 18 buildings and threatens 20,000 more. Evacuations have been ordered in four counties, including Alameda County near Livermore and San Joaquin County near Tracy.

I noted the evacuation of Site 300. In addition, some of Tri-Valley CAREs' community members have already been evacuated in the rural outskirts of Livermore and Tracy - and many more are considering what to do should the evacuation perimeter continue to grow.

This fire danger is a hardship being felt by our Alameda and San Joaquin County communities already suffering recent upswings in the serious, ongoing Covid-19 pandemic.

In sum, the people most directly affected by LLNL activities, current and proposed, are the most overburdened and the least able to fully and meaningfully participate in a public meeting that will be one-night-only this coming Monday and a written comment period that is slated to end on September 21.

Further, the broader public that would also want to comment is likewise challenged to deal the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and children who are currently doing distance learning from home. All of these things and more limit parents' and others' time for civic engagement however well motivated they may

be.

I would note too that the public is faced with a major federal election this November. The media is presently dominated by campaign coverage and the how, when and where of trying to vote in a pandemic.

These are not normal times and therefore they require additional time from the NNSA for submitting comments on the LLNL SWEIS pursuant to the National Environmental Policy Act.

To date NNSA's timing has been tone deaf, and appears intended to capitalize on a limited public response. I am asking you to change this trajectory.

To recap, I am requesting that the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and that a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall.

I request this on my own behalf and also on behalf of Tri-Valley CAREs' community members, whom I represent as the group's Executive Director.

I stand ready to answer any questions you might have. During this pandemic Tri-Valley CAREs' staff, including me, are working from home. Please use my cell at 925.255.3589 if you wish to call – or simply reply to my email address.

Sincerely,

Marylia Kelley

Livermore resident and

Executive Director, Tri-Valley CAREs

Marylia Kelley

Executive Director, Tri-Valley CAREs (Communities Against a Radioactive Environment)

Main office: 4049 First St., Suite 243, Livermore, CA 94551 (all calls and mail are answered; office is not staffed during pandemic)

Satellite office at WorkVine209: 1005 E. Pescadero Ave Suite 167, Tracy (office hours vary; not open during pandemic)

Website: [www.trivalleycares.org](http://www.trivalleycares.org)

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Twitter: @Marylia\_Kelley

Pronouns: she/her/hers

Marylia Kelley

Executive Director, Tri-Valley CAREs (Communities Against a Radioactive Environment)  
Main office: 4049 First St., Suite 243, Livermore, CA 94551 (all calls and mail are answered; office is not staffed during pandemic)

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Promoting environmental cleanup and stopping nuclear weapons where they start... Livermore Lab

\*\*\*\*\*

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\*\*\*\*\*

**From:** [Marylia Kelley](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] second request; thank you for your consideration  
**Date:** Thursday, August 27, 2020 3:34:11 PM

---

[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name:** Marylia Kelley

**Email and/or postal address:** 4049 First Street, Suite 243, Livermore, CA 94551 or [marylia@earthlink.net](mailto:marylia@earthlink.net)

\*\*\*\*\*

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\*\*\*\*\*

**From:** [Marylia Kelley](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] The link for Monday's meeting needs to be updated!  
**Date:** Monday, October 5, 2020 9:10:26 AM

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Good morning. The info was pulled from the NNSA reading room long after the September meeting. We didn't see any new info at that time. Hence the info we posted. That said, thank you so much for your quick reply and the "heads up". We will make the change. Peace,  
Marylia

On Oct 5, 2020, at 6:46 AM, LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)> wrote:

<20201005 LLNL SWEIS Ground Rules and Tipsrev.pdf>

Marylia Kelley  
Executive Director, Tri-Valley CAREs (Communities Against a Radioactive Environment)  
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Promoting environmental cleanup and stopping nuclear weapons where they start... Livermore Lab

\*\*\*\*\*  
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**From:** [Marylia Kelley](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Time-critical follow up meeting request, notice of lack of info on NNSA site, and more  
**Date:** Tuesday, September 15, 2020 10:34:38 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),

Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Sent by email September 15, 2020

Dear Ms. Fana Gebeyehu-Houston

I am following up on several time-critical matters pertaining to the LLNL SWEIS and the virtual public meeting/comment period for its scoping process.

First, I had asked at the virtual public meeting of September 2, 2020 for an informal “zoom” or other remote technology meeting with the LSO to informally discuss the SWEIS, the public meeting slides, the NOI, and some of the key issues in general.

As I noted at the virtual public meeting, in person LLNL/NNSA/DOE NEPA meetings, including during “scoping” often contained an informal session prior to the meeting for Q&A.

Sometimes that informal part of the meeting was conducted like a “poster session” with SMEs at tables around the room, other times the facilitator called on people in the audience. Always it was stated that anything said in the informal part of the meeting was not “on the record” as a comment. That formal public comment session always immediately followed.

I realized during the process of the public scoping meeting that the absence of this process hampered the process greatly from the public’s perspective. The impediment was not that this meeting was “virtual.” This public need could have been met with a virtual “poster session” prior. Or, the reading of the slides during the public meeting could have been handled as part of an informal session with Q&A incorporated.

Neither took place.

With this in mind, I reiterate my urgent request - made that evening on the record - that there be an informal meeting with Tri-Valley CAREs during the public comment period.

I have not heard back. I would like to set up the meeting during September to allow sufficient time for it to inform Tri-Valley CAREs’ formal comment before the close of the public comment period as currently construed. (That date may now be in some doubt, see next point.)

Second, I have gone on the NNSA Office of NEPA compliance website several times since September 2nd looking for the slides and official notice of the slightly expended public comment period. I have found neither.

As of today, I see only this (cut and pasted below):

[Home](#) » DOE/EIS-0547: Site-Wide EIS for Continued Operation of the Lawrence Livermore National Laboratory; Livermore, California

DOE/EIS-0547, prepared by the National Nuclear Security Administration (NNSA), is a site-wide EIS that evaluates the potential environmental impacts of alternatives for the continued operation of the Lawrence Livermore National Laboratory (LLNL) in Livermore, California, for approximately the next 15 years.

More information: Ms. Fana Gebeyehu-Houston, NEPA Document Manager, National Nuclear Security Administration, Livermore Field Office (833-778-0508 or [llnlweis@nnsa.doe.gov](mailto:llnlweis@nnsa.doe.gov)).

**Public Comment Opportunity:**

NNSA invites other Federal and state agencies, state and local governments, Native American tribes, industry, other organizations, and members of the public to submit comments to assist in identifying environmental issues and in determining the appropriate scope of the LLNL site-wide EIS.

NNSA will host an online public scoping meeting on a date to be posted at <https://www.energy.gov/nnsa/nnsa-nepa-readingroom>. NNSA will hold the meeting no earlier than 15 days from the posting of the notice. Public scoping meeting details will also be announced in local media outlets.

Written comments should be sent by mail to Ms. Fana Gebeyehu-Houston, NEPA Document Manager, National Nuclear Security Administration, Livermore Field Office, 7000 East Avenue, L-293, Livermore, CA 94550-9234 or by email to [llnlweis@nnsa.doe.gov](mailto:llnlweis@nnsa.doe.gov).

The comment period closes on September 21, 2020.

**Documents Available for Download**

[DOE/EIS-0547: Notice of Intent](#)

(end cut and paste)

Therefore, I must ask, is there an issue involving the site or site navigation? Or, is it just as it appears, i.e. that these items are not yet posted as of September 15th?

Further, I request an email copy of both the slides from the meeting and the notice of expansion of public comment period. At the public meeting it was said these items would be available, suggesting that the public need not write down every word – a fair, if unmet, expectation.

Third, I want to underscore the comment/request made by a member of the public, Jon Oldfather, at the virtual public meeting that there be a second meeting opportunity for the public to learn more about the SWEIS and what’s planned – and to offer comment.

Finally, I reiterate Tri-Valley CAREs’ request for a longer – and more reasonable – 120 day (from the NOI) extension of the public comment period during this pandemic and extended fire season that are both consuming so much of the public’s time and attention – and of necessity. It’s simply not an option for the public to put the novel corona virus and record fires “on hold” this fall. We would if we could, but we cannot.

The public needs – and deserves - a longer public comment period on the SWEIS. This is made even more urgent by the complexities involved therein and the NNSA’s lack of timely,

available online resources.

Best,

Marylia Kelley

Marylia Kelley

Executive Director, Tri-Valley CAREs (Communities Against a Radioactive Environment)  
Main office: 4049 First St., Suite 243, Livermore, CA 94551 (all calls and mail are answered; office is not staffed during pandemic)  
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Promoting environmental cleanup and stopping nuclear weapons where they start... Livermore Lab

\*\*\*\*\*

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**From:** [Donald Klose](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for Expanded Public Comment Period and a Second Meeting  
**Date:** Monday, August 31, 2020 11:06:05 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name: Donald A. Klose**

**Email and/or postal address: 191 Bayside Ct., Richmond, CA 94804**

**Email: [donklose44@gmail.com](mailto:donklose44@gmail.com)**

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Email to: [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**Subject: NNSA Site-Wide Environmental Impact Statement for the Lawrence Livermore National Laboratory Main Site in Livermore, CA and Site 300 near Tracy, CA**

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include *“Approximately 55 new facility construction projects...”* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state how any new program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must document worker health and safety in all of its analyses. Additional new exposures from proposed bomb-making operations at the Livermore Lab with highly radioactive and hazardous materials must accumulate on top of workers' past exposures.

Radiological dose consequences across LLNL Facilities should be calculated for review, along with human exposure rates.

**5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The emission (release) limits for all hazardous materials must not be increased in this SWEIS. Instead the SWEIS should seek to characterize the nature and extent of all current on-site radioactive materials in concert with the corresponding cleanup levels for past releases into the surrounding environment.

Additional emissions from new radioactive materials proposed for new site-wide activities and testing must then be factored into the cumulative mix. Only then can new background levels be determined for future cleanups.

If changes in cleanup levels are anticipated, the public and affected communities should be given notice that this will occur and the justification for any recommended changes should be provided. If cleanup to background

levels is not achievable, the public and host communities should be informed of that reality and the potential contaminant levels to which they will likely be exposed before they can provide knowledgeable consent to increased cumulative releases over their lifetimes.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *“Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.”* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. As stated above, The SWEIS must explicitly note the quantity and location of all materials currently on-site and all changes resulting from the de-inventory of *Security Category I and II special nuclear materials from LLNL.*

The SWEIS must explicitly categorize all remaining materials, any changes to their administrative limits, and how the de-inventory changed radiological bounding for accident scenarios.

The SWEIS must then undertake an additional analysis for changes to MAR, corresponding administrative limits and radiological bounding accident scenarios that will result from the introduction of new hazardous and radioactive materials to the Livermore Lab and Site 300.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. The environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use the Livermore Lab for “materials testing” of plutonium drive the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts from “materials testing” of plutonium at the Livermore Lab and Site 300 and explain how materials testing will affect the aforementioned changes to MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults and liquefaction zones. The USGS has recently published analyses that show greater quake intensity and other damaging impacts from liquefaction for specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze emissions from Livermore Lab operations and their contribution to global climate change. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events are expected increase in severity and frequency in the coming 15 years. On

The 2000 Cerro Grande wildfire that destroyed 47 structures at Los Alamos National Lab near Santa Fe, New Mexico, is a case on point.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the *“High-Risk Excess Facilities”* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will accomplish this D&D work, the expected delay for accomplishing the planned work, and how the contaminated excess facilities will be managed and monitored to account for all ambient site-wide releases.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “*purpose and need*” for the review. In that section the NNSA claims: “*The U.S. nuclear weapons infrastructure is aging and historically underfunded.*” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “*is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.*” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities and mismanagement than of available resources?

The SWEIS should include an inventory of all existing nuclear weapons infrastructure, a listing of their deficient conditions and relative levels of contamination, with milestones for their refurbishment or decommissioning.

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit with specific budget horizons for each category of needs. Generally speaking, cost should be a consideration in prioritizing the infrastructure work proposed in the SWEIS. Some new infrastructure projects could lose their priority after their overall costs are evaluated. The SWEIS analysis should also evaluate the “need” to recreate capabilities at the Livermore Lab that are duplicative of those at other NNSA sites.

The public should be informed how the Lab’s priorities will be determined in the SWEIS.

**14.** Additionally, the “purpose and need” statement in the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

The goal of achieving disarmament designed to prevent the spread of nuclear weapons, as outlined in the 1969 Treaty on the Non-Proliferation of Nuclear Weapons, deserves paramount consideration as an outstanding international legal obligation of the United States.

In addition to disarmament, the Treaty was designed to promote cooperation in the peaceful uses of nuclear energy.

The treaty obligations of the United States could form the basis for developing alternatives to nuclear weapons development that do not subject workers, the the public, or the environment to highly radioactive and toxic materials.

**15.** Incongruously, the “purpose and need” statement briefly notes: “*LLNL will complete Life Extension Programs, which includes fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.*” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create the most “significant impacts to the environment” and contribute to the spread of nuclear weapons. The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. The SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab that includes verifiable steps toward complete disarmament.

It’s time to reevaluate the nation’s need for a new fleet of nuclear weapons and just how fulfilling that need will serve national security when weighed against continuous releases of toxic materials as those weapons are manufactured, transported, tested and stockpiled at different locations across the country. Continuing impacts to public health, safety and the environment throughout each of these phases, as well as cumulative impacts and excess cancers, over the next 15 years and beyond must be analyzed.

The resulting mountain of waste that will be generated from new weapons production, and the need for a long-term disposal solution to isolate the waste for hundreds of years must be covered in the SWEIS.

**16.** The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of an ongoing pandemic,

statewide fires in California and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in 2021.

Thank you for the opportunity to submit these scoping comments.

Laura Watchempino  
P.O. Box 407  
Pueblo of Acoma, NM 87034

Email (preferred for communications): [5000wave@gmail.com](mailto:5000wave@gmail.com)

**From:** [bonnie@bonnielockhart.com](mailto:bonnie@bonnielockhart.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD ON THE LLNL EIS  
**Date:** Monday, August 31, 2020 5:19:04 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL  
SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period,

they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, Bonnie Lockhart**  
**Oakland CA**  
[Bonnie@bonnielockhart.com](mailto:Bonnie@bonnielockhart.com)

\*\*\*\*\*

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\*\*\*\*\*

**From:** [PAUL MACIOLEK](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS LLNL Site 300  
**Date:** Tuesday, October 6, 2020 4:06:19 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
2. The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include *“Approximately 55 new facility construction projects...”*The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
3. The Livermore Lab Main Site was placed on the Environmental Protection Agency’s Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both

locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.
6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.
7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.
8. Livermore Lab has separately analyzed a plan to increase the size and weight

of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

10. The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightening Complex Fire.

These types of events may increase in severity and frequency in the coming 15 years.

11. The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Michelle Mitchell and Paul Maciolek  
[pmmaciolek@comcast.net](mailto:pmmaciolek@comcast.net)

1728 Knoll Ct

Livermore, CA 94551

Postal Address (provided for completeness):

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**From:** [Raiza Marciscano](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING  
**Date:** Thursday, August 27, 2020 4:44:40 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

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Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link.

The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, R. Marciscano**

**Name: Raiza Marciscano**

**Email and/or postal address: raiza\_m@yahoo.com**

\*\*\*\*\*

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**From:** [Cathy McCoid](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] REQUEST FOR extending the PUBLIC COMMENT PERIOD & A SECOND PUBLIC MEETING  
**Date:** Friday, August 28, 2020 11:29:41 AM

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**I want to support the request extending the public comment period and a second public hearing PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**  
**Sincerely, Cathy McCoid, 9153 Rundelay Way, Sacramento, CA 95826**  
**[chmccoid@gmail.com](mailto:chmccoid@gmail.com)**

\*\*\*\*\*

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**From:** [TEAL.MCCONN](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Public Comment Period  
**Date:** Friday, September 11, 2020 10:28:51 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

### **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

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- 4. That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Teal McConn**  
4451 Greens Ct  
Livermore CA 94551

\*\*\*\*\*

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**From:** [phyllis mcdonald](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for extension--TIME SENSITIVE  
**Date:** Sunday, August 30, 2020 9:43:50 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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controversial.

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4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, Phyllis McDonald**

**Name: Phyllis McDonald**

**Email and/or postal address:**

fillus@comcast.net

\*\*\*\*\*

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**From:** [phyllis mcdonald](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] comment letter  
**Date:** Wednesday, October 21, 2020 9:22:15 PM

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## MY COMMENT LETTER ON THE SCOPE OF THE SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT (SWEIS) FOR THE LAWRENCE LIVERMORE NATIONAL LABORATORY

By email to:

[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager, National Nuclear Security Administration (NNSA), Lawrence Livermore National Laboratory (LLNL), P.O. Box 808, L-293, Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken - and my questions fully answered - in the SWEIS.

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified

nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities - and decision makers and the public alike will have these facts in hand when making decisions.

2. The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "*Approximately 55 new facility construction projects...*" The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
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4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
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following statement: *"Operational changes - Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

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7. The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in

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8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers. **I am highly concerned about this proposed increase as I live in one of the valley cities where prevailing winds would be blowing these toxic contaminants. How could this proposed increase even be considered when it is putting at high risk the well-being of the surrounding population. There is no way the contamination of the atmosphere and environment could even be fully-analyzed and ascertained prior to doing it. In my opinion this proposed increase should not and must not be done at Site 300, one of the most contaminated sites in the country.**
9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.
10. The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Name: Phyllis McDonald**

**Email: fillus@comcast.net**

**Postal address: 2543 Dutchwood Ln  
Manteca, CA 95336**

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**From:** [phyllis mcdonald](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] My COMMENT LETTER  
**Date:** Monday, October 19, 2020 10:06:42 AM

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## MY COMMENT LETTER ON THE SCOPE OF THE SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT (SWEIS) FOR THE LAWRENCE LIVERMORE NATIONAL LABORATORY

Ms. Fana Gebeyehu-Houston, NEPA Document Manager, National Nuclear Security Administration (NNSA), Lawrence Livermore National Laboratory (LLNL), P.O. Box 808, L-293, Livermore, CA 94551-0808

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Sincerely,

**Name: Phyllis McDonald**

**Email: [fillus@comcast.net](mailto:fillus@comcast.net)**

Postal address: 2543 Dutchwood Ln.

Manteca, CA 95336

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Letter to NNSA on the scope of the SWEIS for the continued operation of the Lawrence Livermore National Laboratory Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA during public comment period.

October 5, 2020

Dear Ms. Fana Gebeyehu-Houston:

I live in Manteca, California. I'm writing because there are many proposed changes by the National Nuclear Security Administration regarding Lawrence Livermore Labs and Site 300 operations which will seriously affect my community and surrounding areas for the next 15 years. One of my concerns is the proposal to increase the size and weight of the open-air blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These high explosive detonations involve more than 100 chemically hazardous contaminants. Site 300 is one of the most contaminated sites in the country leaking multiple chemical and radioactive contaminants into the soil and groundwater aquifers.

An alternative that foregoes outdoor detonations with hazardous materials at Site 300 must be analyzed in the Site-Wide Environmental Impact Statement. What is the NNSA doing to address safe alternatives and how will this information be communicated to the public? As residents of the Central Valley, we know that prevailing winds, which are predominantly west to east most of the year, will be blowing those hazardous and toxic contaminants in the direction of our communities. These blasts will degrade our air quality, as well as threaten the health and well-being of our residents and wildlife, and impact the economic progress of this area. Due to the seriousness of this issue, I am taking it to the Manteca City Council for their consideration. We are aware that other communities and organizations have expressed their concerns and protests to the NNSA. We will continue to engage, including informing the populace through media and other means of Livermore Lab's plans to pollute the air we breathe at one of the most contaminated outdoor sites in the country.

A concerned citizen,

Phyllis McDonald

fillus@comcast.net

**From:** [L.Miles](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] comment on sweis scoping  
**Date:** Sunday, August 30, 2020 5:48:50 PM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment

period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name: Loulena Miles of Richmond, California**

**Email address: [loulena@hotmail.com](mailto:loulena@hotmail.com)**

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**From:** [L.Miles](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Comment on SWEIS Scoping  
**Date:** Monday, October 5, 2020 12:50:20 PM

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[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
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Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
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each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

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Sincerely,

Loulena Miles

[loulena@gmail.com](mailto:loulena@gmail.com)

Richmond, CA 94804

\*\*\*\*\*

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\*\*\*\*\*

**From:** [PAUL MACIOLEK](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request 90 day Ext to Public Comment Period  
**Date:** Friday, August 28, 2020 11:24:13 AM

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Dear Ms. Gebeyehu-Houston:

With this email we are requesting a 90-day extension to the public comment period for the State-Wide Environmental Impact Statement for the Continued Operation of the Lawrence Livermore National Laboratory.

Regards,  
Michelle Mitchell and Paul Maciolek

\*\*\*\*\*

This message does not originate from a known Department of Energy email system. Use caution if this message contains attachments, links or requests for information.

\*\*\*\*\*

**From:** [Patricia Moore](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL SWEIS scoping  
**Date:** Wednesday, October 7, 2020 9:13:12 PM

---

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS

should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Name: Patricia Moore, MSW

Email (preferred for communications): tmyoga@comcast.net

Postal Address (provided for completeness): 23 Diamond Drive,  
Livermore, CA 94550

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October 21, 2020

Ms. Fana Gebeyehu-Houston  
NEPA Document Manager  
National Nuclear Security Administration  
Lawrence Livermore National Laboratory  
P.O. Box 808, L-293, Livermore, CA 94551-0808

*By Email to:* [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Re: Scoping Comments on the LLNL SWEIS

Dear NEPA Document Manager:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (LLNL) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Nuclear Watch New Mexico is a nonprofit watchdog organization based in Santa Fe, New Mexico. We seek to promote safety and environmental protection at nuclear facilities; mission diversification away from nuclear weapons programs; greater accountability and cleanup in the nation-wide nuclear weapons complex; and consistent U.S. leadership toward a world free of nuclear weapons.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions." Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the draft SWEIS.

First, I am skeptical of the timing of the initiation of this new SWEIS for LLNL during the COVID-19 pandemic and just before the November 3 election. As a prerequisite, the National Nuclear Security Administration (NNSA) should have already begun a nationwide programmatic environmental impact statement (PEIS) on expanded plutonium pit production which would then inform the LLNL SWEIS of the Livermore Lab's role in that national effort, which is not insignificant. Following that pit production PEIS, both a LLNL and Los Alamos National Laboratory SWEIS should proceed in parallel. It is particularly striking that NNSA is claiming NEPA compliance while relying on an outdated Complex Transformation Supplemental PEIS and LANL SWEIS, both completed in 2008, and refusing to prepare new or supplemental ones.

In my view, it is also hypocritical of NNSA to begin a new LLNL SWEIS but not a LANL SWEIS. All of the conditions are met for a new LANL SWEIS as they are for a new LLNL SWEIS, if not even more so. I can only surmise that this is part and parcel of a conscious decision by NNSA to avoid any new analysis under the National

Environmental Policy Act (NEPA) that could possibly slow down its headlong rush into expanded plutonium pit production, which is arguably illegal and will no doubt waste taxpayers' money. One need only to refer to a recent Government Accountability Office report for the obvious pitfalls there, as follows:

- As we [GAO] have previously reported, NNSA has been unable to plan for and complete major construction projects on time. It has spent billions of dollars designing and partially constructing several one-of-a-kind major capital asset projects (i.e., facilities with a cost greater than \$750 million), only to reassess and, in some cases, ultimately cancel the projects. We have reported on improvements in recent years in the execution of ongoing major construction projects, but few new major projects have been started recently.
- In the last 2 decades, LANL has twice had to suspend laboratory-wide operations after the discovery of significant safety issues. Specifically, from July 2004 through May 2005, LANL suspended operations to address pervasive safety issues. From 2013 through 2016, LANL had to pause operations at PF-4 because of concerns with the criticality safety program. A recurrence of such issues prior to the SRS facility becoming operational could affect pit production.
- A 2018 LANL study found that LANL is “marginally capable” of meeting NNSA’s plan to ramp up pit production to 30 pits per year by 2026 and sustaining that rate thereafter.
- NNSA’s October 2017 AOA [Analysis of Alternatives] to examine options for reestablishing a pit production capability stated that establishing pit production under any of the alternatives that NNSA considered, including using the facility at SRS, is unlikely to be achievable by 2030 even under the most optimistic circumstances.
- An independent March 2019 study by the Institute for Defense Analyses found that repurposing the SRS facility to produce pits by 2030 would be unprecedented—and could not find an instance where an NNSA project that cost over \$700 million was completed in less than 16 years. The study concluded that no available production option considered by NNSA—including its plan to split production between LANL and SRS—could be expected to provide 80 pits per year by 2030.<sup>1</sup>

Thus, the draft LLNL SWEIS should explain why it exists but not a LANL SWEIS. The very title of the GAO report points the informed reader to the deep interconnectedness of LANL and LLNL, as the Livermore Lab is the design agency for the new W87-1 ICBM warhead, while the Los Alamos Lab will produce the plutonium pit bomb cores for it. But to restate, first there should be a programmatic environmental impact statement (PEIS) on expanded plutonium pit production, then followed by parallel LLNL and LANL Site-Wide Environmental Impact Statements.

The remainder of my comments focus only on the LLNL SWEIS.

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<sup>1</sup> *NNSA Should Further Develop Cost, Schedule, and Risk Information for the W87-1 Warhead Program*, GAO, September 2020, pp. 29-31 (footnotes omitted) <https://www.gao.gov/assets/710/709253.pdf>

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15 years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
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Sincerely,

Jay Coghlan.  
Executive Director

Email (preferred for communications): [jay@nukewatch.org](mailto:jay@nukewatch.org)

Postal address (provided for completeness): Nuclear Watch New Mexico  
903 W. Alameda, #325  
Santa Fe, NM 87501

**From:** [Pat Ob](#)  
**To:** [LLNL SWEIS](#)  
**Subject:** [EXTERNAL] comment  
**Date:** Monday, October 5, 2020 7:21:48 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "*early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.*" Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

- 1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.
- 2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "*Approximately 55 new facility construction projects...*" The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- 3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.
- 4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
- 5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "*Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.*" NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's

operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: “*Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.*” Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

**8.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightening Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

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**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: “*The U.S. nuclear weapons infrastructure is aging and historically underfunded.*” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump

took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: “LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Pat OBrien

Orleans, MA

[patob777@gmail.com](mailto:patob777@gmail.com)

\*\*\*\*\*  
This message does not originate from a known Department of Energy email system.  
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**From:** [jon oldfather](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Extension of public comment period  
**Date:** Friday, August 28, 2020 1:12:03 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

### **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed, Jonathan Oldfather**

**158 pine st**

**Name:**

**Email and/or postal address:**

\*\*\*\*\*  
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**From:** [jon oldfather](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Re: Extension of public comment period  
**Date:** Monday, August 31, 2020 8:12:01 PM

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Dear Ms. Gebeyehu-Houston,

I appreciate your response.. I regret I will not be able to attend the meeting September 2nd. For an important document like the scoping and preparation of a site wide eis it imperative that the public have an opportunity to provide input. Please schedule an additional meeting along with additional time for comments.

Sincerely, Jon Oldfather. 415-377-3931

On Mon, Aug 31, 2020 at 3:30 PM LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)> wrote:

Dear Mr. Oldfather,

I am writing to acknowledge that the National Nuclear Security Administration's (NNSA) Livermore Field Office has received your email. Thank you for your input.

We will be reviewing your suggestions carefully and will reply to you as soon as possible. We look forward to working with you and other stakeholders as we prepare a new Site-wide Environmental Impact Statement (SWEIS) for Lawrence Livermore National Laboratory.

For immediate reference the date and time of the meeting is Wednesday, September 2, 2020 at 6pm Pacific Daylight Time and can be also accessed at the link in the Federal Register announcement.

Sincerely,

Fana Gebeyehu-Houston

NEPA Document Manager

Livermore Field Office

**From:** jon oldfather [mailto:[jon.oldfather@gmail.com](mailto:jon.oldfather@gmail.com)]

**Sent:** Friday, August 28, 2020 4:14 PM

**To:** LLNLSWEIS <[llnlsweis@nnsa.doe.gov](mailto:llnlsweis@nnsa.doe.gov)>

**Subject:** [EXTERNAL] Re: Extension of public comment period

I didn't complete my address

Jon Oldfather

[158 Pine St, San Anselmo, CA 94960](#)

[jon.oldfather@gmail.com](mailto:jon.oldfather@gmail.com)

On Fri, Aug 28, 2020 at 1:11 PM jon oldfather <[jon.olfather@gmail.com](mailto:jon.olfather@gmail.com)> wrote:

Ms. Fana Gebeyehu-Houston, NEPA Document Manager

National Nuclear Security Administration (NNSA),

Lawrence Livermore National Laboratory (LLNL)

P.O. Box 808, L-293

Livermore, CA 94551-0808

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**Signed, Jonathan Oldfather**

**158 pine st**

**Name:**

**Email and/or postal address:**

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Use caution if this message contains attachments, links or requests for information.

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**From:** [jon.olfather](mailto:jon.olfather)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] my comments on the scope of the LLNL SWEIS  
**Date:** Tuesday, October 13, 2020 12:14:02 PM

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I am pleased to submit my comments below on the scope of the LLNL SWEIS.  
Some of the writing is my own. I am also including the comments of others which I fully support.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Thank you,  
Jonathan Oldfather  
158 Pine Street  
San Anselmo, CA, 94960  
tel: 415-377-3931

email: [jon.olfather@gmail.com](mailto:jon.olfather@gmail.com)

Comments:

1<sup>st</sup> – make sure you break no laws

UN Non-Proliferation Treaty – Signers, including US, "Declare their intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament."

New weapon development is incompatible with the goals and intent of the NPT.  
A scope of this EIS should include the alternative of no development of any new nuclear weapons systems. The cessation of all work on new nuclear weapon system design and development should be considered.

Plutonium experiments at the LLNL site and site 300 that are not directly related to the determination of the viability of nuclear weapons currently in the arsenal should stop because they violate the NPT.

The scope should also include whether plutonium experiments should cease at the NIF facility as they result in plutonium contamination and releases and, if they are intended to facilitate development of new nuclear weapon systems, violate the NPT.

The notice of intent states there exist "35 new facility construction projects" and "65 discrete projects". Each of these projects should be subject to the criteria – does it involve a new nuclear weapon system, or is it solely for the stewardship of the existing nuclear arsenal? All projects that exceed in the narrowest sense the stockpile

stewardship role of the lab should not proceed, as they violate the NPT and are unlawful. The scope of the SWEIS should consider alternatives that do not include any nuclear weapon research beyond the narrowest interpretation of stockpile stewardship, possibly eliminating the need for a number of these 100 projects.

2<sup>nd</sup> - minimize hazards and do no harm

All research using plutonium at LLNL and site 300 is too dangerous, especially in light of past security and safety failures at these facilities, for the highly populated area where these facilities exist. The scope of the SWEIS should include the alternative of moving, when possible, these activities to a less populated area.

Environmental contamination:

The scope of the EIS should include a proposal for lowering the threshold for the release of plutonium and tritium during operations at LLNL and site 300 by an order of magnitude (a factor of 10) to protect the citizens of the Bay area and the rest of California.

The scope should include the increase of funding for environmental remediation and safeguards to protect local people.

In addition to the above comments, please include the following:

- 1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

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The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

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assertions in the Federal Register Notice that the Lab *"is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition."* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

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**From:** [Inga Olson](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] NNSA SWEIS for LLNL Public Comment  
**Date:** Monday, October 5, 2020 10:41:31 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Inga Olson

olsoning@yahoo.com

4729 Hazelwood Ave.

Carmichael, CA 95608

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**From:** [Tom O'Neill](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Re: diversification of activities at LLNL  
**Date:** Thursday, October 8, 2020 7:38:22 PM

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- typo in earlier draft

On Thursday, October 8, 2020, 07:26:26 PM PDT, Tom O'Neill <tomboneill34@yahoo.com> wrote:

To those charged with this review of scope at LLNL:

I've known and greatly enjoyed conversation and written exchanges with many personnel at LLNL. For instance, I spent many hours learning the views of Marion Fulk on "depleted uranium" during his retirement. At one time, as I understand, Marion had some responsibility as an enforcer of "safety compliance" at LLNL. He told me that an attitude went back even before Los Alamos and "Trinity"--told me that "all these guys are cowboys." "Cowboys" was an affectionate term; but Marion used it to convey "they just don't give a damn about protecting themselves from radiation." At LLNL when Marion would nag the personnel about the risks they were running through their non-compliance with safety protocols, I got the impression they tended to brush him aside. I know that that during the time I was a frequent visitor at his home, he was being sought after by retired personnel to help them with their medical claims over radiation exposure.

It was not just with regard to this kind of thing that I've known people at the Lab. I have known many personnel--scientists, technicians, and science writers --often through shared involvement in civic affairs. Let me speak frankly: in all matters I've found them remarkably and refreshingly rational except with regard to their job assignment. I do not at all want to see this rich assemblage of brilliance and genius dispersed. What bothers me though is that so much of their on-the-job energy goes to the care and feeding of our nuclear arsenal. Until my retirement eight years ago, I was an instructor at our local community college, specializing in epistemology and ethics. I cannot conceive of a situation in which a use by us again (!!!) of nuclear weapons would provide us with greater national security than we enjoyed immediately prior to such use. The numbers and possibilities of combination in response to any use are simply incalculable. And if one says, "We don't intend to use them; we just intend to threaten such use," I am fully convinced that this threat sends exactly the wrong message to people everywhere.

I am not anti-Lab; and I am certainly not anti-science. Short of a coup, it now seems inevitable that our current president will soon be replaced. That will create, one can hope, some wiggle room regarding the budget of the Department of Energy. A massive organization like LLNL cannot execute a 180-degree turn, but it's conceivable LLNL could start moving incrementally in new directions.

Considering the immense amount of intelligence, and the immense amount of computer capacity and immense amount of competence in utilizing that capacity which LLNL now houses, there are two fronts in particular on which it seems likely the Lab could make a world-changing contribution.

One front has to do with salt-free water. As the planet warms, and as we resolutely increase the planet's human population toward somewhere in the nine billions, a desperate situation threatens us with regard to water. We cannot drink salt-water, nor can we farm with it. Right now, water is evaporating faster and is descending again more hap-hazardly and unmanageably than in any time known to human memory. As potable and agricultural water is decreasing, thirsty and hungry humans increase. Friction between China and India already is rising in response. Anticipating yet more widespread trouble, it could prove a great benefit to have computerized programs monitoring where all the water resources are, what the present and future demands on them are likely to be, where the best opportunities for conserving and increasing the store of water are, and by what means this can be done. (One can see, incidentally, that 1) such an enterprise will move forward only if internationally there is great mutual trust, and that 2) such trust is not likely to develop so long as we are intimidating the rest of the world at large with our nuclear arsenal.)

The second front has to do with energy. Both our government and our largest corporations seem to be convinced that we will be guilty of a terrible act of waste unless we use the last ounce of fossil-fuel on land or sea before we move on to serious, full-time development of alternative sources of energy. Yet every person attentive to science knows this is a disastrous notion which will doom the human future if we continue to entertain it. The problems however of conversion, replacement, and innovation are immense--and this may be why we are so reluctant to move forward and take hold of them. In this matter too, it seems the skills and technology assembled at the Lab could be of wprld-wide utility. There are many different potential sources of energy. Some may be much better suited to one place than to another. The economics of different localities may also indicate that one course of action is more promising than another. Differences of habits and skills may also be significant. Further, in many cases a networking of diverse approaches may be highly desirable. The kind of intricate, near-infinite planning needed is, fortunately, at hand today. The Lab is a place where there's a great concentration of it. Here, in fact, the nuclear specializing of the Lab could prove quite valuable. Who can make a better judgment than the nuclear scientists at the Lab as to whether we have so learned the lessons of Three-Mile Island, Chernobyl, and Fukishima that we can now build safe, self-monitoring nuclear power plants--as, say, James Hansen hopes? (An affirmative finding could go a long way toward solving our water problems.)

There are concerns much on the minds of climatologists today. I hope you will give some weight to these thoughts about diversifying the mission of the LLNL as you conduct your scope of the current possibilities.

Respectfully yours,

Tom O'Neill 900 E. Stanley Blvd.; Livermore, CA 94550 925-579-2144 tomboneill34@yahoo.com

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**From:** [Sheila](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [Sheila Parks](#)  
**Subject:** [EXTERNAL] Comments on Livermore Lab by NNSA re SWEIS  
**Date:** Monday, October 19, 2020 1:47:57 PM  
**Importance:** High

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Sheila Parks, EdD**

[sheilaruthparks@comcast.net](mailto:sheilaruthparks@comcast.net)

319 Arlington Street  
Watertown, MA 02472

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**From:** [mary\\_perner](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS Public Comments  
**Date:** Wednesday, October 21, 2020 4:05:31 PM

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Ms. Fana Gebeyehu-Houston,  
NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293 Livermore, CA 94551-0808

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2. The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include “Approximately 55 new facility construction projects...” The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

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SWEIS states that expected operational changes at Livermore Lab include: “Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.” Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

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impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

8. Livermore Lab has separately analyzed a plan to increase the size and weight of openair bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

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12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: “The U.S. nuclear weapons infrastructure is aging and

historically underfunded.” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

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Administration's controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS "purpose and need" should not be driven by the Trump NPR, which in any event is a policy document and not a law.

15. Then the "purpose and need" statement briefly notes: "LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons." This statement is left to stand without further explanation of what "testing" and "maintenance" entail. Yet, it is precisely the weapons work covered by that sentence that will create "significant impacts to the environment." The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is

appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, when it is completed.

Thank you for your attention,

Mary Perner  
maryqkontrary@yahoo.com  
3717 Carrigan Common  
Livermore, CA 94550-4856

\*\*\*\*\*

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**From:** [Cecile Pineda](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS  
**Date:** Monday, October 19, 2020 12:55:47 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include *“Approximately 55 new facility construction projects...”* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency’s Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.
5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "*Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios.*" NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.
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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

CEcile Pineda  
2550 DAAna Street  
Berkeley CA. 94704  
5 10 981-1858

NOTICE: Due to Presidential Executive Orders still not rescinded by the present administration, the National Security Agency may have read this email without warning, warrant, or notice, and certainly without probable cause. They may do this without any judicial or legislative oversight.

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**From:** [CONNIE REDING](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL Site-Wide Environmental Impact Statement Scoping Process  
**Date:** Saturday, August 29, 2020 2:16:22 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

- 1. That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
- 2. That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
- 3. That the second online public meeting will be publicized well in advance of the date it will be held, and*
- 4. That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

**Name: Connie Reding, Tracy, CA 95376**

**Email and/or postal address:**

**email address: [credingtwhite@comcast.net](mailto:credingtwhite@comcast.net)**

**mailing address:**

**1734 Ray Wise Lane  
Tracy, CA 95376**

\*\*\*\*\*

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**From:** [Pamela Richard](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL]  
**Date:** Monday, August 31, 2020 11:44:24 AM

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to: Ms. Fana Gebeyehu-Houston, NEPA Document Manager from: Ms Pamela Richard  
National Nuclear Security Administration (NNSA), 5422 W Wells St  
Lawrence Livermore National Laboratory (LLNL) Milwaukee, WI 53208  
P.O. Box 808, L-293 [pamrichard35@gmail.com](mailto:pamrichard35@gmail.com)  
Livermore, CA 94551-0808

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**From:** [gail rieger](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Request for extension  
**Date:** Thursday, August 27, 2020 6:59:23 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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4. That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.

Thank you.  
Signed,  
Gail Rieger  
grieger2003@yahoo.com  
1028 Atherton Dr.  
Tracy, CA 95304

\*\*\*\*\*

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**From:** [prochelle1@aol.com](mailto:prochelle1@aol.com)  
**To:** [LLNLSWEIS](mailto:LLNLSWEIS@nnsa.doe.gov)  
**Subject:** [EXTERNAL] Scope of the NNSA SWEIS for Livermore Lab: Comments  
**Date:** Monday, October 19, 2020 3:55:41 PM

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[LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

**5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

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**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

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analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

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**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the *“High-Risk Excess Facilities”* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *“purpose and need”* for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some

new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Name: Paula Rochelle**

**Email (preferred for communications): [prochelle1@aol.com](mailto:prochelle1@aol.com)**

**18980 Lynbrook Court, Saratoga CA 95070**

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**From:** [Stephen Roddy](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Extension of Public Comment Period & Seond Public Meeting on LLNL Site-wide EIS  
**Date:** Monday, August 31, 2020 2:43:45 PM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a “Site 300” High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab’s budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In “normal” times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from “normal” times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post an easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a

longer public comment period, they could submit written comments more readily.

This “hurry up” schedule is happening at the very time we the public must deal with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

\*\*\*\*\*

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**From:** [Naomi Schiff](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Please extend public comment and hold a second hearing on the sitewide EIS  
**Date:** Monday, August 31, 2020 1:45:21 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

**REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

Dear Ms. Gebeyehu-Houston,

**I request extension of the public comment period, and holding of a second public EIS meeting.**

**This is too important to give it short shrift, or to slide it under the rug. Our whole bay area region will be affected by the activities at LLNL.**

**For far less critical and less dangerous projects, here in Oakland, we have had longer environmental impact comment times than this. And that was not even during a pandemic or other emergency such as is now limiting public access to public hearings!**

**I only heard about this hearing today, and already have another conflicting hearing to attend. How will I decide which to participate in?**

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Naomi Schiff  
[naomi@17th.com](mailto:naomi@17th.com)

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**Naomi Schiff**  
**238 Oakland Avenue**  
**Oakland, CA 94611**

510-835-1819  
Cell: 510-910-3764  
Email: [Naomi@17th.com](mailto:Naomi@17th.com)

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**From:** [jef schultz](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Livermore Lab  
**Date:** Monday, October 5, 2020 10:04:49 AM  
**Attachments:** [mq\\_info.txt](#)

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National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

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Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**From:** [jef.schultz](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] We Need More Time and Oversight!  
**Date:** Thursday, August 27, 2020 9:00:31 AM  
**Attachments:** [mq\\_info.txt](#)

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Hello,

On August 5, 2020 the Livermore Lab and its parent agency, the National Nuclear Security Administration (NNSA) announced a decision to conduct a new Site-Wide Environmental Impact Statement (SWEIS) to analyze operations at the Lab's Main Site in Livermore and its Site 300 near Tracy, CA over the coming **15 years**. The National Environmental Policy Act (NEPA) is the law that governs the process along with the NNSA's own guidance regarding how it will implement the law.

The first step in undertaking a new Site-Wide Environmental Impact Statement is called "scoping." That's the step triggered by the agency's formal "Notice of Intent" to prepare a SWEIS, published in the Federal Register on August 5th. You can read the Notice at <https://www.energy.gov/sites/prod/files/2020/08/f77/noi-eis-0547-llnl-site-wide-2020.pdf>

The law requires that there be an early and open process for determining the scope of the issues to be addressed by the review. Remember that this document will authorize activities for 15 years, i.e., until 2036 at a minimum. This is your opportunity to offer input on what the Site-Wide Environmental Impact Statement should include. The law says scoping is for the **"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."**

Following the "scoping" process, the NNSA and Livermore Lab will produce a Draft SWEIS. That too will have a public hearing and comment period, but they will be more narrowly focused as the "scope" of the review will have already been determined before the draft is written. In short, the "scoping" period going on now is an important part of the process! The agency's choice of timing appears intended to minimize public involvement in the activities of this controversial nuclear weapons lab. We must rise to meet the challenge.

The Federal Register Notice includes a cursory **outline** for the draft SWEIS that is partly the bare bones of what the law requires in terms of sections that any SWEIS must include and partly a very editorial vision of what the NNSA and Livermore Lab want the SWEIS to include (and what they don't want it include).

This scope outlined in the Federal Register Notice includes a statement of **"purpose and need"** for the review. In that section the NNSA has the audacity to claim: "The U.S. nuclear weapons infrastructure is aging and historically underfunded." The facts say otherwise. Tri-Valley CAREs documented substantial budget increases for NNSA and its weapons labs during the last administration. And during the current administration the NNSA budget to "modernize" is 50% higher than when President Trump took office. The NNSA has squandered billions on these weapons of nuclear mass destruction. For the coming fiscal year alone, NNSA requested \$15.6 billion for nuclear weapons activities. Livermore Lab requested \$2.2 billion.

Yet, despite years of budget increases for nuclear weapons activities, LLNL asserts

that it “is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” This begs the question, why haven’t the existing funds been used to maintain existing infrastructure?

Additionally the “purpose and need” statement capitalizes on the Trump Administration’s controversial 2018 Nuclear Posture Review and its call for a costly new generation of nuclear weapons. Then the “purpose and need” statement briefly notes: “LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.” This statement is left to stand without further explanation of what “testing” and “maintenance” entail.

Yet, it is precisely the weapons work covered by that single sentence that will create **“significant impacts to the environment.”** This is clear from the Superfund cleanup of past weapons programs. Both the Main Site and Site 300 are Superfund sites and the cleanup will continue until sometime around 2060 (yes, nuclear weapons activities have caused that much pollution, including in multiple groundwater aquifers).

The Federal Register Notice mentions in passing that the “Proposed **operational changes** are expected to include: “Changes to **material-at-risk**, administrative **limits**, and **radiological** bounding accident scenarios as a result of the deinventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012.”

Lets be clear. In plain English this is saying that NNSA and Livermore Lab will utilize this process to **increase the amount of nuclear bomb grade plutonium** that the Lab will be authorized to handle, use in experiments, and store at its Main Site in Livermore. This is a central reason – if not **the** reason – that the agency has decided to do a new SWEIS.

Some of our long-time members will recall that in 2008 Tri-Valley CAREs gleaned the information that Livermore Lab had failed a force-on-force security drill in which one team of mock terrorists accessed the Lab’s plutonium facility and held it long enough to detonate a radiological bomb while a second team left the site unmolested with enough plutonium to detonate a nuclear bomb anywhere.

We alerted the media, launched a public petition, and testified before the U.S. Congress. The upshot was that Livermore Lab lost its Category I/II security clearance to house nuclear bomb making quantities of plutonium and highly enriched uranium on site. That removal process was completed in 2012. Now, NNSA and Livermore Lab want to bring some of that nuclear material back. After they proved they could not keep it (and us) safe.

The Federal Register Notice is silent on the details but it is worth noting that Livermore has been designated the lead lab in the development of a novel warhead, called the **W87-1**, which will require a new plutonium core unlike anything in the stockpile or in storage. Moreover, largely to serve the “needs” of this novel warhead, the NNSA has testified to Congress that its number one priority is to expand **plutonium bomb core production**. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. The environmental review document for Los Alamos contains a chart that shows that site shipping plutonium to Livermore Lab for “material testing” for new bomb

cores.

This is a prime example of why public participation matters in a SWEIS process. At the public meeting and in written comments we the public can ask questions about this - and offer comments on its appropriateness in the highly populated Bay Area with earthquake fault zones all around.

The scoping process for the SWEIS "is an opportunity for the public to assist NNSA in determining the alternatives and issues for analysis," according to the Federal Register Notice. Tri-Valley CAREs stands ready to "assist." We invite all members of the public to join us.

In this regard, it is worth noting that several important programs being proposed by Livermore Lab did not get any mention in the Federal Register Notice. One of them is the plan to increase the size of toxic bomb blasts ten fold. These tests are slated to be carried out at Site 300 on outdoor "firing tables" with no air pollution control technology. Livermore Lab produced a paltry "assessment" and then applied to the Air District for a permit. These bomb blasts and other similar programs must be included in the SWEIS.

While the Federal Register Notice spends too little time describing Livermore Lab's current and proposed programs, it spends a lot on ink telling the public what it doesn't want to look at. It states that "Alternatives that NNSA will not consider as reasonable are: The complete closure and decontamination and decommissioning of the Livermore Site or Site 300, and transfer of current missions/operations from LLNL to other sites, as those actions would be inconsistent with the LLNL mission defined by NNSA." This illustrates the agency's unwillingness to self-examine and is not an actual effort to analyze reasonable "alternatives," especially the lack of unique mission for Site 300.

Interestingly, the document also mentions that "Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished." This likely includes the "High-Risk Excess Facilities" identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the general public living and working near the Lab. We are eager to learn more specifics about plans to D & D these facilities. We will ask questions too about the funding to accomplish this program. The \$109 million funding that was supposed to be used to start some of this work in the coming year instead got allocated to nuclear weapons projects at the Lab instead.

Jeffrey Schultz  
Fortunate Farm LLC  
Caspar, CA

**From:** [jef.schultz](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL Comments  
**Date:** Monday, October 19, 2020 12:57:57 PM  
**Attachments:** [mg\\_info.txt](#)

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *"early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions."* Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

**1.** The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

**2.** The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include *"Approximately 55 new facility construction projects..."* The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

**3.** The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

**4.** More than 2,000 current and former Livermore Lab employees have applied

through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

**5.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

**6.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

**7.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use "variances" for "materials testing" of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking "materials testing" of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

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**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the

Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightening Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *"Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished."* It is assumed that this includes the *"High-Risk Excess Facilities"* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead "reallocated" to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *"purpose and need"* for the review. In that section the NNSA claims: *"The U.S. nuclear weapons infrastructure is aging and historically underfunded."* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to "modernize" is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *"is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition."* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

**13.** The "purpose and need" statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the "need" for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the "purpose and need" statement for the SWEIS is heavily dependent on the Trump Administration's controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture

reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

**Jef Schultz**

**[jefschultz@hotmail.com](mailto:jefschultz@hotmail.com)**

**15401 N. Hwy 1 #104**

**Caspar, CA 95420**

**From:** [dfgassman@aol.com](mailto:dfgassman@aol.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Lawrence Livermore National Laboratory  
**Date:** Monday, August 31, 2020 7:56:28 PM

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## **REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD AND A SECOND PUBLIC MEETING ON THE LLNL SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT**

The National Nuclear Security Administration and Livermore Lab have begun a public process to receive input on the scope of a new Lawrence Livermore National Laboratory (LLNL or Livermore Lab) Site-Wide Environmental Impact Statement (SWEIS), which is being prepared pursuant to the National Environmental Policy Act.

The Notice of Intent to prepare a new SWEIS was published in the Federal Register on August 5, 2020. The Federal Register Notice states that the public comment period is for a scant 45-days and will close on September 21, 2020.

Further, the Federal Register Notice does not publicize the date and time for an online public scoping meeting, but states only that when such a meeting is scheduled a note will be placed on the NNSA website at <https://www.energy.gov/nnsa/nnsa-nepa-reading-room>. The NNSA web site later announced an online meeting, scheduled very soon after it was posted, specifically on Wednesday, September 2, 2020.

Livermore Lab is a more than \$2 billion dollar a year enterprise involving two physical locations, a Main Site in Livermore in Alameda County and a "Site 300" High Explosives Testing Range near Tracy in San Joaquin County.

For the coming fiscal year 88.7% of Livermore Lab's budget is for nuclear weapons activities, which are inherently complex and controversial.

Controversial as well is the proposal published in the August 5, 2020 Federal Register Notice to use this Site-Wide Environmental Impact Statement process to increase the amount of plutonium and other nuclear bomb grade materials that can be used (and stored) at Livermore Lab.

In "normal" times, this Federal Register Notice would establish a public comment period that is far too short (for 45-days) - with a public meeting that is being held far too close to its announcement (on September 2).

And, these are far from "normal" times.

The public meeting on September 2 is virtual, to be held online via a WebEx link. The technology itself limits the people who can participate. For example, low-income families and others who are technology challenged for a variety of reasons may not be able attend, and certainly not on short notice.

If NNSA and Livermore Lab would agree to post a easily accessible recording of the September 2 public meeting – along with a written transcript – then those who were not able to attend via WebEx link would be able to obtain its content. With a second public meeting that is publicized well in advance, these and other members of the public could make arrangements to participate. And, with a longer public comment period, they could submit written comments more readily.

This "hurry up" schedule is happening at the very time we the public must deal

with the health risks of the Covid-19 pandemic, high unemployment, a faltering economy on “Main Street,” and, often, children who are doing distance learning from home.

Further, some of the people most directly affected by Livermore Lab operations have had to flee their homes due to the still ongoing fires, and the Livermore Lab’s Site 300 High Explosives Testing Range near Tracy had to be evacuated due to fire danger.

All of these things and more and severely limit the public’s capacity for civic engagement unless there is sufficient time for people to schedule it well in advance.

**Therefore, I request:**

1. *That the public comment period be extended to 120-days from publication of the Notice of Intent on August 5, 2020 and,*
2. *That a second online public meeting be set for the Livermore Lab Site-Wide Environmental Impact Statement Scoping process later this fall, and*
3. *That the second online public meeting will be publicized well in advance of the date it will be held, and*
4. *That the NNSA and Livermore Lab advise me of any action they are taking pursuant to my request.*

**Signed,**

Patricia H. Seffens  
389 Belmont Street #111  
Oakland, CA 94610  
Home: 510-835-2334  
[DFGassman@aol.com](mailto:DFGassman@aol.com)

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**From:** [kelsey.shank@theedgewins.com](mailto:kelsey.shank@theedgewins.com)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL Draft SWEIS  
**Date:** Friday, March 5, 2021 9:31:46 AM  
**Attachments:** [image001.png](#)

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Good afternoon, during the public meeting last September, a NEPA process timeline was provided that showed the Draft SWEIS would be issued sometime during the Spring or Summer of 2021.

I wanted to follow up to see if there was a forecasted month in which the Draft is expected to be issued?

Thank you,

*Kelsey Shank*

theEDGE, LLC

Phone: 509-713-4740

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**From:** [Bernadette Soltis](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Site-Wide Environmental Impact Statement  
**Date:** Monday, October 5, 2020 12:17:52 PM

---

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

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Sincerely,  
B Soltis

Sent from my iPad

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**From:** [Cletus](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] SWEIS  
**Date:** Thursday, October 15, 2020 12:48:38 PM

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Ms.FanaGebeyehu-Houston,NEPADocumentManager  
NationalNuclearSecurityAdministration(NNSA),  
LawrenceLivermoreNationalLaboratory(LLNL)  
P.O.Box808,L-293  
Livermore, CA 94551-0808

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Sincerely,

Cletus Stein

5113 sw 16<sup>th</sup>

Amarillo tx 79106

cletusjg3@suddenlink.net

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**From:** [Doug Stevenson](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Livermore National Laboratory  
**Date:** Monday, October 5, 2020 10:32:31 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA)  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

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**From:** [Muriel Strand](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] environmental review of lawrence livermore lab  
**Date:** Monday, October 5, 2020 10:31:54 AM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
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15. Then the “purpose and need” statement briefly notes: “LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Muriel Strand, P.E.

[aunty@earthlink.net](mailto:aunty@earthlink.net)

PO Box 5625  
Sacramento CA 95817

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October 21, 2020

Sent by Email to: [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Comments by Patrice Sutton, San Francisco Bay Physicians for Social Responsibility on scope of the National Nuclear Security Administration's Site-Wide Environmental Impact Statement (SWEIS) to analyze operations at the Livermore Lab's Main Site in Livermore and its Site 300 near Tracy, CA over the next 15 years or more.

I am Patrice Sutton, I have a Masters of Public Health, and for the past 35 years I have conducted research and have published extensively on the health impacts of harmful environmental exposures, working as an environmental health scientist for the California Department of Public Health and the University of California San Francisco. Currently I am the Chair of the Environmental Health Committee at San Francisco Bay Physicians for Social Responsibility, and my comments are on behalf of SF Bay PSR.

We call on the NNSA to consider two key issues regarding their Livermore Lab Site Wide Environmental Impact Statement:

1. Process
2. Public Health

**First, process.**

The current hurried and severely constrained time frame for public input is incompatible with reality. The Lab is situated in a community and state that is facing a pandemic which precludes in person public meetings, and presents daunting economic, technological, and time challenges to community members whose input you are purportedly seeking; these hardships are especially impactful for community members of color and who are poor. Fires are raging, leading to evacuation of impacted community members, and exemplified by the evacuation of Livermore Lab's Site 300 High Explosives Testing Range near Tracy due to the fire danger.

The outcome of the SWEIS will be a key determinant of our local, state, national and global public health, for at least 15 years into the future. With the stakes so high, it is ludicrous to have such a short time period for public comment. If you were trying to craft a process that would exclude people from such a high-stakes decision making process, you have succeeded.

We call on the Lab to immediately address the inadequacies of this public process by at a minimum an additional 90 days, and optimally until the pandemic permits in-person meetings that can actually engage the public.

**Second, the public health harms ignored by your proposed SWEIS.**

There is a long history documenting the immense threat that nuclear weapons pose to public health and human existence. The American Public Health Association and the World Health Organization, are just two of the many voices of public health professionals who have determined it is not possible for a country to “win” or survive a nuclear war, that such a war would kill millions of people both directly and indirectly, and that such a war cannot be limited geographically. A disproportionate amount of detrimental health and environmental effects of nuclear weapons have and continue to be suffered by indigenous, colonized, and minority populations from the nuclear-weapons development and production cycle. The U.S. has over 40,000 hazardous sites for nuclear weapons waste; the cleanup cost so far is \$41.1 billion. The long-lived nature of radioactive and other environmental releases from the nuclear weapons cycle ensures timeless human exposure. The U.S. National Academy of Sciences reports: “At many sites, radiological and non-radiological hazardous wastes will remain, posing risks to humans and the environment for tens or even hundreds of thousands of years. Complete elimination of unacceptable risks to humans and the environment will not be achieved, now or in the foreseeable future.”<sup>1</sup>

The current SWEIS is willfully blind to this history, ignores the unmet needs of this legacy of environmental destruction, and extinguishes the immense harm to the public health implicit in the mission of Livermore National Laboratory from public review and comment. Specifically, the proposed SWEIS rationale is concerned with the Lab’s “aging infrastructure” and “historical underfunding” and while it is organized to include alternatives analysis it states: “Alternatives that NNSA will not consider as reasonable are: The complete closure and decontamination and decommissioning of the Livermore Site or Site 300. “

You may think it unreasonable, yet this is really **the only alternative that is consistent with human health and survival** and as health professionals we strongly state our concern to you that precluding life and health affirming alternatives analysis from the scope of this EIS is antithetical to the purpose of the law.

Further, the SWEIS states: “The U.S. nuclear weapons infrastructure is ... historically underfunded.” This is inconsistent with the historical record. The U.S. spent, between 1945 and 1996, \$5.5 trillion on nuclear weapons and related programs. This expenditure exceeded all other categories of government spending during this period, except for non-nuclear national defense and Social Security. According to the U.S. Congressional Budget Office, the U.S. plans to spend an estimated \$1.2 trillion, approximately \$4 million an hour, to upgrade and modernize its nuclear weapons and delivery systems over the next 30 years.<sup>2</sup> Cleanup, an illusory concept, is also expensive; the complete remediation costs were estimated to be \$50-60 billion in 2004.<sup>3</sup> Even without the additional plans to upgrade and modernize

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<sup>1</sup> Wald, M. *Nuclear sites may be toxic in perpetuity, report finds*. New York Times August 8, 2000; Available from: <https://www.nytimes.com/2000/08/08/us/nuclear-sites-may-be-toxic-in-perpetuity-report-finds.html>

<sup>2</sup> Congressional Budget Office. *Approaches for managing the costs of nuclear weapons forces, 2017 to 2046*. 2017. Available from: [www.cbo.gov/publication/53211](http://www.cbo.gov/publication/53211)

<sup>3</sup> Lichtenstein, N.D., *The Hanford Nuclear Waste Site: A Legacy of Risk, Cost, and Inefficiency*. Natural Resources Journal, 2004. 44(3): p. 809-839.

weapons, and to remove known nuclear waste, the U.S. currently spends \$22.43 billion dollars on nuclear weapons and associated costs, which otherwise could provide funding for nearly 303,000 clean energy jobs, VA medical care for more than 2 million returning military veterans, or wind power for 38.6 million households, to name a few alternative expenditures.<sup>4</sup>

In addition, such expenditures could instead be used to address major deficiencies in U.S. and global public health infrastructure and access to healthcare, revealed most recently by the COVID-19 pandemic, which weaken national security and create health vulnerabilities.

We note that during the current administration the NNSA budget to “modernize” is 50% higher than when President Trump took office. The NNSA has squandered billions on these weapons of nuclear mass destruction. For the coming fiscal year alone, NNSA requested \$15.6 billion for nuclear weapons activities. Livermore Lab requested \$2.2 billion.

We request that the SWEIS provide the basis of its conclusion of “underfunded” and in the name of transparency provide the actual data on what we have spent on this deadly process that you seek to perpetuate.

Moreover, the SWEIS must fully consider climate change.

First, it must account for how the Lab’s emissions will contribute to our climate emergency.

Second, the SWEIS must account for how our climate emergency will impact the Lab’s operations. Our climate emergency already is, and will increasingly, wreck-havoc with even the most health conservative assumptions as to where groundwater will flow, where fires will rage, and where people will live. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

Third, and most importantly given the mission of the Lab’s operations, the SWEIS must include how nuclear weapons can accelerate a climate catastrophe. A potential conflict involving no more than a few hundred nuclear weapons, similar to the size used on Hiroshima could result in global environmental damage, threatening the food supply and leading to mass starvation worldwide for up to 2 billion people, and further global collateral fatalities.<sup>5,6</sup>

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<sup>4</sup> National Priorities Project. *Trade-offs: your money, your choices*. April 2019. Available from: <https://www.nationalpriorities.org/interactive-data/trade-offs/?state=00&program=15>.

<sup>5</sup> Toon, O.B., et al., *Rapidly expanding nuclear arsenals in Pakistan and India portend regional and global catastrophe*. *Science Advances*, 2019. **5**(10): p. eaay5478.

<sup>6</sup> Helfand, I., *Nuclear famine: two billion people at risk? Global Impacts of Limited Nuclear War on Agriculture, Food Supplies, and Human Nutrition*. 2013, International Physicians for the Prevention of Nuclear War, Physicians for Social Responsibility.

In summary, we feel the intellectual underpinnings of this SWEIS are what is antiquated, we ask that the scoping of the SWEIS be afforded due public process, and that the SWEIS permit real alternative visions consistent with the reality of the history of what nuclear weapons has wrought in terms of health and human suffering, and alternatives to national security that are based on the real needs of the people you serve.

Sincerely,

A handwritten signature in blue ink that reads "Patrice Sutton". The signature is written in a cursive, flowing style.

Patrice Sutton, MPH  
Chair, Environmental Health Committee  
San Francisco Bay Physicians for Social Responsibility  
[psutton2000@yahoo.com](mailto:psutton2000@yahoo.com)

311 Douglass Street, San Francisco, CA 94114

*Please note that my preferred method for all notices involving the SWEIS is by email, provided below. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.*

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**From:** [Carl Tilchen](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] LLNL SWEIS  
**Date:** Monday, September 7, 2020 2:52:15 PM

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Re Suite-Wide Environmental ImpactStatement:

I am requesting a 90 day extension to the comment period to increase the amount of nuclear bomb-grade plutonium at the Lawrence Livermore National Laboratory.

My comment is:

This would be very dangerous in the highly populated Tri Valley Area.

The United States already has more than enough nuclear weapons to kill the entire population of our Earth 10 times +++!

Our country needs to put our resources toward working for peace.

**Carl Tilchen**  
**Dublin, CA**

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**From:** [Dorcas Tokes](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Public comment: NNSA Environmental review of Livermore Lab  
**Date:** Monday, October 5, 2020 9:09:07 PM

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The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the "needs" of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for "material testing." How will the plan to use Livermore for "materials testing" of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare "variances" to Livermore Lab's plutonium limits to

accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

The Federal Register Notice states that “*Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.*” It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: “*The U.S. nuclear weapons infrastructure is aging and historically underfunded.*” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “*is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.*” Why haven’t the funds received by the Lab been used to

adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

Then the “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Dorcas Tokes

[dtokes@gmail.com](mailto:dtokes@gmail.com)

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By email to: [LLNLSWEIS@nnsa.doe.gov](mailto:LLNLSWEIS@nnsa.doe.gov)

Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

Tri-Valley CAREs is a non-profit organization founded in 1983 by Livermore, California area residents to research and conduct public education and advocacy regarding the potential environmental, health, and proliferation impacts of the Department of Energy's (DOE) Lawrence Livermore National Laboratory (LLNL or Livermore Lab). Tri-Valley CAREs has grown over the years to 6000 members, most of whom live near the Livermore Lab Main Site or its Site 300 high explosives testing range. On behalf of our members, we submit the following comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory Main Site in Livermore, CA and Site 300 near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "*early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.*" Therefore, we ask that the analyses we are requesting be fully undertaken – and our questions fully answered – in the SWEIS.

- **The SWEIS should analyze an alternative future for Livermore Lab;** one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

Specifically, the SWEIS must analyze a "Reduced Operation Alternative" for Livermore Lab. The term "reduced operation alternative" is defined in the 2005 Livermore Lab SWEIS as including two distinct components. As stated in the 2005 SWEIS Summary: "The Reduced Operation Alternative is broadly defined as approximately a 30-percent scaledown from the Stockpile Stewardship Program operations under the No Action Alternative. This includes reduction in support activities in addition to direct program cuts. This alternative considers and analyzes reasonable proposals **provided by the public** for the reduction or cessation of specific operations to reduce adverse environmental impacts [emphasis added]."

We suggest this alternative analyze a 30% or greater scaledown from the “Stockpile Stewardship Program operations” (e.g. work funded under the NNSA Weapons Activities budget line) under the No Action Alternative. This alternative should highlight the reduced environmental impacts from this scaledown. Additionally, it should consider the impact both environmentally and fiscally of transferring current missions/operations from LLNL to other sites, despite the blanket assertion in the 2020 Federal Register Notice that doing so would be “unreasonable.” It is completely reasonable that over the next 15 years the federal approach to nuclear weapons policy and funding will shift and the Lab should be prepared to undergo a reduction and/or transfer of mission/operations to other NNSA sites that pose less of a threat to the public due to geography and population density. Moreover, other sites may have generally less expensive costs of doing business than the San Francisco Bay Area.

Separately, the SWEIS should also analyze an Alternative “provided by the public” in which LLNL undergoes a 30-80% scaledown from the Stockpile Stewardship Program operations under the No Action Alternative to one in which the Lab moves to undertake more unclassified, civilian science work. This alternative would have different impacts than the across the board scaledown alternative noted above; for example it could entail a more robust workforce focused on projects that benefit the environment with fewer negative environmental impacts. This examination of civilian science-based alternative mission areas for Livermore Lab could include such things as: more basic sciences, minimizing and preventing infections disease pandemics, climate change adaptation and amelioration technologies, expanded nuclear nonproliferation and treaty verification, environmental cleanup technologies, alternative fuels, clean energy technologies, battery development, energy-grid efficiency, green building technologies, and other science areas that deal with the many challenges facing the United States (and the world) in the 21<sup>st</sup> century. We note that Livermore Lab currently already has small programs in many of these areas. Thus, it is completely “reasonable” under NEPA to analyze an alternative in which these programs grow larger and more dominant over the years. In some circles this alternative is spoken of as Livermore Lab becoming a national “Center of Excellence” in civilian sciences.

- **Purposes for construction.** The NNSA “Scoping Meeting” slides on the SWEIS posted in the agency’s reading room state that the document will include “*Approximately 55 new facility construction projects...*” The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.
- **Superfund cleanup analysis.** The Livermore Lab Main Site was placed on the Environmental Protection Agency’s Superfund list of most contaminated sites in the nation in 1987. The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities

considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

- **Employee exposure, health and safety.** More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

- **Radioactive and toxic emissions.** The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: *"Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios."* NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased. In this context we note, and include by reference, our NEPA comments in the 2005 SWEIS process, including our historical analysis showing how varying levels of tritium use at Livermore Lab have been directly correlated to the varying levels of tritium emitted to the environment, including emissions designated as both "accidental" releases and "routine" releases. In sum, tritium gas is difficult to contain and more tritium use = more releases = more exposures.

- **Special Nuclear Material limits and risks.** The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: *"Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012."* Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis in the SWEIS of the potential impacts of any changes to the limits instituted when and after these materials were removed.

The NNSA slides used for the virtual public scoping meetings were ambiguous as to whether the SWEIS would include a detailed analysis of changes to operations or limits that were instituted *after* the 2005 SWEIS Record of Decision. Specifically, these changes were initiated when Livermore Lab failed a 2008 force-on-force security drill in which one team of mock terrorists accessed the Lab's plutonium facility and held it long enough to detonate a radiological bomb while a second team left the site unmolested with enough plutonium to detonate a nuclear bomb anywhere. Because of that failure, the Lab lost its "Category I/II" authorization for special nuclear materials, necessitating the de-inventory process noted in the Federal Register Notice. Since, and to this day (we are told), Livermore Lab has "Category III" authorization only. This limits the amount of material allowed in specific buildings and onsite at the Main Site as a whole. As we understand it, no plutonium is allowed at Site 300. The SWEIS must contain a clear and complete crosswalk between (a)

those post-2008 restrictions to “Category III” as instituted, (b) any changes made since the initial restrictions at the Main Site or Site 300, and (c) any future changes contemplated in the SWEIS. One part of that analysis should consider that the Livermore Lab security force was reduced at the time of the de-inventory and has subsequently trained to protect material only at the “Category III” limit and not to the more strenuous security requirements of “Category I/II”.

- **NNSA Plutonium Pit Production and LLNL’s potential role including Analytical Chemistry, Material Characterization and/or Material Testing.** The NNSA has testified to Congress that its number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” (See DOE/EIS-0380-SA-06, page 21.) How will the plan to use Livermore for “material testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “material testing” of plutonium – or other plutonium activities - for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “material testing” of plutonium, or any other new plutonium activity, and explain in detail how this activity does or does not comply with the aforementioned reduced (Category III) MAR and administrative limits.

- **A future that does not include the W87-1 development must be considered.** The SWEIS must fully consider the direct connection between NNSA’s plans for expanded pit production and the present day development at Livermore Lab of a new warhead, called the W87-1 [formerly called the Interoperable Warhead], which will require those new pits. Additionally, this new warhead design is itself controversial. President Obama held up its development for five-years and, while President Trump gave the new warhead a “green light” in fiscal 2019, Congress is debating its funding. House appropriation bills have contained cuts, the Senate has required additional studies, and those funding debates may escalate at a minimum. The future of the W87-1 development is far from assured. The Livermore Lab SWEIS has an obligation to consider an alternative that does not include the W87-1.

The Government Accountability Office (GAO) recently found: “NNSA currently estimates that the W87-1 will be the most expensive warhead program since the end of the Cold War, will be produced using entirely new or remanufactured nuclear and nonnuclear components, and will require the development of a range of new technologies. However, as previously discussed, the W87-1 program is not required to follow the rigor and best practices of analyzing alternatives that would provide assurance that the teams are applying consistent, reliable, and objective approaches to assessing design choices.” (See NNSA Should Further Develop Cost, Schedule, and Risk Information for the W87-1 Warhead Program, GAO, September 2020.)

The GAO report goes on to note the myriad ways in which the W87-1 program entails technical risk, noting for example that “NNSA did not consider cost estimates in early design decisions for the W87-1,” and that “the plan to newly manufacture all components of the warhead increased the estimated cost because it added substantial complexity to the work that will be required to engineer and qualify the W87-1.” The report also states that “for the most costly remaining design decision – that of the additional enhanced safety and security features - NNSA did not follow all of the AOA [Analysis of Alternatives] procedure’s best practices.” The report notes too that the W87-1 development at Livermore Lab lacks a formal “study plan.”

Another dimension to the precarious nature of the W87-1 development program at Livermore Lab is its direct connection as noted above to NNSA’s pit production goals. In this regard, the GAO stated in its September 2020 report: “We were unable to fully assess the extent to which the two pit production facilities will be ready to produce pits for the W87-1 because NNSA’s plutonium program—which is managing the facility readiness efforts—has not yet completed an integrated schedule for the overall pit production effort.”

The GAO findings - and others like them - underscore that it is reasonable to consider a future in which the W87-1 is either severely “down scoped” or cancelled altogether. The SWEIS must not take the current program objectives as cast in granite (assured, permanent) when the W87-1 objectives may be more properly characterized as cast in sand (uncertain, changeable).

- **Open-air detonations at Site 300.** Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS.

- **Persistent problems with high explosives at the Main Site and Site 300.** In addition to the Lab’s plan to detonate bigger bomb blasts outdoors at Site 300, there are persistent problems with a broad spectrum of high explosives procedures, control mechanisms, and facilities at the Main Site and Site 300 that must be addressed in the SWEIS. On September 9, 2020 the Department of Energy Inspector General (DOE IG) issued a report on “The Department of Energy’s Management of Explosive Materials at Lawrence Livermore National Laboratory.” It disclosed that serious problems persist in the Lab’s management of high explosives. The inspectors discovered multiple ways in which Livermore Lab ignores required regulations governing the management of these high-risk substances.

For example, Livermore Lab is not following any uniform set of regulations for “inventory procedures.” Inspectors found that the “custodians” of the high explosives were doing their own inventorying of the materials in violation of the requirement that explicitly states, “Physical inventories shall be performed by the use of personnel other than the custodians of the property.” These regulations are in place to create efficiency and prevent this

material from going missing. The inspectors found several inventory errors that resulted from these various management systems and could lead to a loss (or theft) of explosive material.

Additionally, inspectors found physical problems with high explosives storage. For example, the report says that “we observed two damaged storage containers, one having a broken handle, and the other partially damaged, unsealed, and infested with insects.” In addition the report, “observed that some of LLNL’s explosives storage facilities showed signs of physical deterioration at Site 300.

Further, storage space limitations were noted in relation to planned life Extension Programs and warhead development activities. Under NEPA future storage needs should be analyzed not only in light of building new or modified facilities but also in light of potentially reducing Life Extension Program/warhead development activities to address the issue.

- **Change of Mission at Site 300.** More generally, an analysis must be done of the utility, cost, and environmental impacts of maintaining the High Explosives mission at Site 300. This should be done in light of new information including the “Tracy Hills” development of 5500 new homes, which have begun construction. DOE/NNSA documents show the Tracy Hills development property line extending essentially to the fence line at Site 300. Further the SWEIS should analyze use of other NNSA sites that perform much of the same function farther away from population centers. Site 300 has been identified by previous administrations as an excess DOE site that has potential as a green energy production site (including wind farms and environmental remediation technologies). This and other potential uses (return to wild park land for example) should be examined in the SWEIS. The Site 300 mission change should also be analyzed as one component of the “reduced operations alternative.” In this regard we note that Site 300 has a small workforce and that some LLNL employees classified as working at Site 300 routinely work at the Main Site.
- **Earthquake risks and new data at the Main Site and Site 300.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.
- **Climate change.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

- **Excess facilities.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the *“High-Risk Excess Facilities”* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

- **Aging infrastructure claims and the need to assess them as a ranked priorities question.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *“purpose and need”* for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than availability of funds?

The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

- **Overreliance on the 2018 Nuclear Posture Review as a basis for the SWEIS purpose and need.** The “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

- **All Life Extension Programs and new warhead development.** The “purpose and need” statement briefly notes: *“LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by*

*conducting testing and maintenance of weapons.”* This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, an extended statewide fire season and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that Tri-Valley CAREs’ preferred method for all notices involving the SWEIS is by email. Executive Director Marylia Kelley and Staff Attorney Scott Yundt would each like to receive links as they become available, including but not limited to the Draft SWEIS and all associated notices.

Our preferred email addresses are below.

Sincerely,

Marylia Kelley  
Executive Director  
[marylia@earthlink.net](mailto:marylia@earthlink.net)

Scott Yundt  
Staff Attorney  
[sjyundt@gmail.com](mailto:sjyundt@gmail.com)

**From:** [Norris, J. Michael](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [Jacobsen, Eric](#); [Janowicz, Jon A](#)  
**Subject:** [EXTERNAL] Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER20/0337 - NOI EIS NNSA Site-Wide Environmental Impact Statement for Continued Operation of the Lawrence Livermore National Laboratory Livermore, California (LLNL SWEIS)  
**Date:** Tuesday, August 11, 2020 10:21:22 AM

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The U.S. Geological Survey has no comments to offer until the EIS is ready for review.  
J. Michael Norris

James Michael Norris (Mike)  
Water Mission Area  
Office of Quality Assurance  
Manager of Environmental Document Review Program  
603 226-7847  
cell 603 831-0013  
[mnorris@usgs.gov](mailto:mnorris@usgs.gov)  
331 Commerce Way, Pembroke NH, 03275

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From: [oepchq@ios.doi.gov](mailto:oepchq@ios.doi.gov) <[oepchq@ios.doi.gov](mailto:oepchq@ios.doi.gov)>  
Sent: Wednesday, August 5, 2020 8:53 AM  
To: Reddick, Virginia; Treichel, Lisa C; Alam, Shawn K; Braegelmann, Carol; Kelly, Cheryl L; Whitlock, Janet L; Yazzie, Harrilene J; Howerton, B J; Harris, Melissa M; Whitesides, Scott M; Edmonds, Joseph W; Tkach, Andrew R; Taylor, Theresa J; Cunningham, Catherine (Cathy) S; ERs, FWS HQ; ERs, FWS HQ; Werdel, Nancy; Fox, Samuel H; Runkel, Roxanne; Norris, J. Michael; Hall, Harold; [oepchq@ios.doi.gov](mailto:oepchq@ios.doi.gov)  
Subject: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER20/0337 - NOI EIS NNSA Site-Wide Environmental Impact Statement for Continued Operation of the Lawrence Livermore National Laboratory Livermore, California (LLNL SWEIS)

This e-mail alerts you to a Environmental Review (ER) request from the Office of Environmental Policy and Compliance (OEPC). This ER can be accessed here. <[https://ecl.doi.gov/ER\\_summary.cfm?id=35230](https://ecl.doi.gov/ER_summary.cfm?id=35230)>

To access electronic ERs visit the Environmental Assignments website: <https://ecl.doi.gov/ERs.cfm>. For assistance, please contact the Environmental Review Team at 202-208-5464.

Comments due to Agency by: 09/21/20

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\*\*\*\*\*

**From:** [Mike Vandeman](#)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS)  
**Date:** Sunday, October 4, 2020 10:41:47 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

I appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: "early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions." Therefore, I ask that the analyses I am requesting be fully undertaken – and my questions fully answered – in the SWEIS.

1. The SWEIS should analyze an alternative future for Livermore Lab; one in which the Lab does more unclassified, civilian science work and less work on developing new and modified nuclear bomb designs. The Federal Register Notice, posted in the NNSA reading room, states that this SWEIS will guide activities at Livermore Lab for the next 15-years or more. It is therefore a responsibility of the agency to fully analyze an alternative path so that the environmental impacts of civilian science research can be compared to the impacts of nuclear weapons activities – and decision makers and the public alike will have these facts in hand when making decisions.

2. The NNSA "Scoping Meeting" slides on the SWEIS posted in the agency's reading room state that the document will include "Approximately 55 new facility construction projects..." The SWEIS should be clear about which new facilities will be used for nuclear weapons research and development and which ones will not.

3. The Livermore Lab Main Site was placed on the Environmental Protection Agency's Superfund list of most contaminated sites in the nation in 1987.

The Livermore Lab Site 300 high explosives testing range was placed on the EPA Superfund list in 1990. Both locations have multiple chemical and radioactive contaminants that have leaked into soils and groundwater aquifers, as well as some surface waters at Site 300. Both locations have on-site and off-site contamination that is being cleaned up under the Superfund law. Both locations have cleanup activities that will need to continue for the next 40 years or more. This past contamination must be fully considered in the SWEIS. Additionally, the SWEIS must state whether any program activities considered in the document will complicate or delay any of the Superfund monitoring or cleanup underway.

4. More than 2,000 current and former Livermore Lab employees have applied through the U.S. Department of Labor's Energy Employee Occupational Illness Compensation Program for compensation due to serious illnesses, including cancer, believed to have been caused by on-the-job exposures to radioactive and toxic materials. The SWEIS must consider worker health and safety in all of its analyses. Further, the document must consider past worker exposures when contemplating further operations with these potentially deadly materials.

5. The NNSA "Scoping Meeting" slides on the SWEIS contain the following statement: "Operational changes – Changes to tritium emissions limits and Administrative Limit for plutonium and accident scenarios." NNSA noted in particular that the SWEIS would seek to raise the emission limit for tritium, which is radioactive hydrogen. The SWEIS should not be used to justify increasing any radioactive emissions. Instead the SWEIS should analyze an alternative in which Livermore Lab's operations with radioactive materials are reduced or curtailed. The emission (release) limits for all hazardous materials should be reduced, not increased.

6. The Federal Register Notice for preparation of the SWEIS states that expected operational changes at Livermore Lab include: "Changes to material at risk (MAR), administrative limits, and radiological bounding accident scenarios as a result of the de-inventory of Security Category I and II special nuclear materials from LLNL, which was completed in 2012." Weapons-usable quantities of plutonium and highly enriched uranium were the specific materials removed in bulk quantities at that time. There must be an explicit analysis of the potential impacts of any changes to the limits instituted when these materials were removed.

7. The NNSA has testified to Congress that its

number one priority is to expand plutonium pit (bomb core) production. The rationale and timing for expanded pit production is driven by the “needs” of the W87-1 warhead under development at Livermore Lab. The production sites will be at the Savannah River Site in SC and the Los Alamos Lab in NM. That said, the environmental review document for pit production at Los Alamos contains a chart that shows that site shipping plutonium from New Mexico to Livermore Lab for “material testing.” How will the plan to use Livermore for “materials testing” of plutonium affect the changes being considered for MAR and administrative limits in the SWEIS? In the past, Livermore Lab officials have said they could declare “variances” to Livermore Lab’s plutonium limits to accomplish testing of bomb cores coming from Los Alamos. Will Livermore Lab use “variances” for “materials testing” of plutonium for pit production? The SWEIS needs to detail all potential impacts of Livermore undertaking “materials testing” of plutonium and explain in detail how this activity does or does not comply with the aforementioned MAR and administrative limits.

8. Livermore Lab has separately analyzed a plan to increase the size and weight of open-air bomb blasts at Site 300 by as much as ten-fold per each blast and more than 7-fold annually. These planned high explosives detonations involve more than 100 chemically hazardous contaminants. A future alternative that foregoes these outdoor detonations with hazardous materials at Site 300 must be analyzed in the SWEIS. Additionally, an analysis must be done of the utility, cost, and environmental impacts of maintaining Site 300 when other NNSA sites perform much of the same function farther away from population centers.

9. The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

10. The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations’ potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300

had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

11. The Federal Register Notice states that “Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.” It is assumed that this includes the “High-Risk Excess Facilities” previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

12. The scope for the SWEIS outlined in the Federal Register Notice includes a statement of “purpose and need” for the review. In that section the NNSA claims: “The U.S. nuclear weapons infrastructure is aging and historically underfunded.” Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab “is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.” Why haven’t the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available funds?

13. The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS

should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

14. Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

15. Then the “purpose and need” statement briefly notes: “LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

Name: Mike Vandeman, Ph.D.

Email (preferred for communications): [mjvande@pacbell.net](mailto:mjvande@pacbell.net)

Postal Address (provided for completeness): 2600  
Camino Ramon # 3s400d, San Ramon, CA 94583-5099

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I am working on creating wildlife habitat that is  
off-limits to humans ("pure habitat"). Want to help?  
(I spent the previous 8 years fighting auto dependence and road construction.)

Wildlife must be given top priority, because they  
can't protect themselves from us.

Please don't put a cell phone next to any part of  
your body that you are fond of!

<https://mjvande.info>

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**From:** [YUCCA@EarthCare](mailto:YUCCA@EarthCare)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Public Comment for SWEIS Scope for Lawrence Livermore National Lab  
**Date:** Wednesday, October 21, 2020 8:46:32 PM

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Ms. Fana Gebeyehu-Houston, NEPA Document Manager  
National Nuclear Security Administration (NNSA),  
Lawrence Livermore National Laboratory (LLNL)  
P.O. Box 808, L-293  
Livermore, CA 94551-0808

Dear Ms. Fana Gebeyehu-Houston:

We are writing on behalf of YUCCA - a membership environmental justice organization comprised of young people concerned about the impacts of fossil fuel and nuclear extraction and pollution on the human and environmental health and safety of our own and future generations. As New Mexicans we know all too well the environmental impacts of nuclear contamination in our waters, lands, and bodies from National Laboratory operations. We appreciate this opportunity to submit comments on the scope of the National Nuclear Security Administration's (NNSA) Site-Wide Environmental Impact Statement (SWEIS) for the continued operation of the Lawrence Livermore National Laboratory (Livermore Lab) Main Site in Livermore, CA and Site 300 high explosives testing range near Tracy, CA.

Pursuant to the National Environmental Policy Act the purpose of scoping is: *“early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.”* Therefore, we ask that the analyses we and other advocates request be fully undertaken – and our questions fully answered – in the SWEIS.

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**9.** The SWEIS must fully consider the latest data from the United States Geological Survey (USGS) on earthquake scenarios in the Bay Area near the Main Site and the Central Valley near Site 300. Both the Main Site and Site 300 are on or very near earthquake faults. The USGS has recently published analyses that show greater quake intensity and other damaging impacts (e.g. possible liquefaction) for these specific areas of California.

**10.** The SWEIS must fully consider the impacts of climate change. On the one hand, it must analyze Livermore Lab operations' potential contribution to global climate change due to emissions. The SWEIS must also analyze the impact of fires and other extreme weather events related to climate change on the Livermore Lab itself. In the current firestorms of summer/fall 2020, Site 300 had to be evacuated due to the proximity of the SCU Lightning Complex Fire. These types of events may increase in severity and frequency in the coming 15 years.

**11.** The Federal Register Notice states that *“Over the 15-year LLNL SWEIS planning horizon, NNSA has identified more than 110 excess facilities, totaling more than 1.1 million square feet, to be decontaminated, decommissioned, and demolished.”* It is assumed that this includes the *“High-Risk Excess Facilities”* previously identified by the Department of Energy Inspector General, but also many more facilities that pose a risk to workers and the public. Please include specific information in the SWEIS about plans to D&D each of these 110 facilities. Additionally, after \$109 million that was supposed to be used for D&D work in fiscal 2021 was instead “reallocated” to nuclear weapons projects at the Lab, please specify in the SWEIS how the Lab will prioritize this D&D work, the expected time horizon for accomplishing the planned work, and how the buildings will be maintained in the meantime.

**12.** The scope for the SWEIS outlined in the Federal Register Notice includes a statement of *“purpose and need”* for the review. In that section the NNSA claims: *“The U.S. nuclear weapons infrastructure is aging and historically underfunded.”* Yet, there have been substantial budget increases for NNSA and its weapons labs during both the Obama and Trump administrations. In particular, during the current administration, the NNSA budget to “modernize” is 50% higher than when President Trump took office. In the context of these funding increases, the SWEIS should fully review assertions in the Federal Register Notice that the Lab *“is in need of facilities and infrastructure investments. Half of the operating buildings at LLNL are assessed as being inadequate or in substandard condition.”* Why haven't the funds received by the Lab been used to adequately maintain existing infrastructure? Is this more a question of priorities than of available

**13.** The “purpose and need” statement outlined in the Federal Register Notice suggests that Livermore Lab is expecting ever-greater amounts of funding in future years. These expectations must be made explicit and analyzed in detail. Generally speaking, expenditures of funds should be a consideration in the infrastructure work the SWEIS proposes. Perhaps some new infrastructure projects should not be

undertaken when their funding demand is considered. How will priorities be determined? These considerations must be fully explored in the SWEIS. Additionally, the SWEIS should take into account the “need” for capabilities at Livermore Lab that might be duplicative of other NNSA sites.

**14.** Further, the “purpose and need” statement for the SWEIS is heavily dependent on the Trump Administration’s controversial 2018 Nuclear Posture Review (NPR) and its call for a costly new generation of nuclear weapons. Over the 15-year time frame of the SWEIS, the 2018 NPR will be mooted by one or more new posture reviews, potentially very different than the one issued by the current President. A new NPR could be underway even before the SWEIS process is completed. Thus, the SWEIS “purpose and need” should not be driven by the Trump NPR, which in any event is a policy document and not a law.

**15.** Then the “purpose and need” statement briefly notes: “*LLNL will complete Life Extension Programs [this is a catch-all phrase the agency uses to describe fully new warhead designs as well as refurbishments] by conducting testing and maintenance of weapons.*” This statement is left to stand without further explanation of what “testing” and “maintenance” entail. Yet, it is precisely the weapons work covered by that sentence that will create “significant impacts to the environment.” The SWEIS needs to detail the scope and timeframes of the Life Extension Programs (LEPs) planned for Livermore Lab. It also needs to explain to what extent – and in what quantities – radioactive and toxic materials will be on site to accomplish the LEPs. And, as noted above, the SWEIS also needs to thoroughly analyze an alternative future for Livermore Lab.

The NNSA extended the public comment period for scoping the SWEIS by 30-days (from September 21, 2020 to October 21, 2020). The additional time is appreciated. However, the comment period should be extended for an additional 90-days during this historic period of a still-raging pandemic, statewide fires and other events and stressors that make commenting particularly difficult for members of the public during this time.

Please note that my preferred method for all notices involving the SWEIS is by email. I would like to receive links as they become available, including but not limited to the Draft SWEIS, which is anticipated to be completed in spring/summer 2021.

Sincerely,

YUCCA (Youth United for Climate Crisis Action)

[yucca@earthcarenm.org](mailto:yucca@earthcarenm.org)

6600 Valentine Way, Building A Santa Fe, NM 87507

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**From:** [YUCCA@EarthCare](mailto:YUCCA@EarthCare)  
**To:** [LLNLSWEIS](#)  
**Subject:** [EXTERNAL] Statement in opposition to the temporary authorization for Tritium venting  
**Date:** Wednesday, October 21, 2020 9:26:14 PM

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To the Department of Energy,

We are writing on behalf of YUCCA - a membership environmental justice organization comprised of young people concerned about the impacts of fossil fuel and nuclear extraction & pollution on the human and environmental health and safety of our own and future generations. YUCCA is strongly opposed to the Los Alamos National Laboratory's proposal for a temporary authorization to vent 114,000 Curies of radioactive tritium into the air because it ignores the required public process. In the middle of a pandemic, national depression, and two weeks before the general election, New Mexicans are suddenly being asked to weigh in on a contentious project that was proposed in March but has been withdrawn due to public backlash. This is a completely unreasonable request of the communities that would be potentially impacted by the proposals. As COVID-19 cases are surging, Northern New Mexicans are focused on meeting our families' basic needs and cannot be expected to attend virtual meetings without adequate notice and genuine measures for accessibility.

Further, a temporary authorization is only good for 180 days. There are several other, and larger, tritium-venting projects required by LANL contracts. The current proposal is an attempt to piecemeal the venting work instead of revealing the scope of the entire project now.

This is a very serious issue. We cannot afford additional public health threats at this time. The proposed venting could expose residents to dangerous levels of radiation at a time when so many are already vulnerable. Because Tritium is a hydrogen isotope, it easily bonds with oxygen to form radioactive water in which living organisms are likely to absorb by respiration or ingestion.

During last night's info session, which was only held after both of New Mexico's senators requested it, a representative of LANL seemed to attempt to argue that this proposed project was safe. However, the info session was run poorly, seeing that no one was able to see the slides, and there was intermittent feedback, which made it incredibly difficult to hear the people who were speaking. In March communities called for a robust and transparent public information and consultation process. The information session last night was woefully inadequate.

The public must be informed, given the opportunity to provide feedback and also be

presented with alternatives to managing the disposal of the radioactive tritium. Ultimately LANL should be prevented from creating the waste and the resulting public health threat in the first place.

Sincerely,

Youth United for Climate Crisis Action (YUCCA Action)

Youth United for Climate Crisis Action (YUCCA Action)

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**From:** [Scott Yundt](#)  
**To:** [LLNLSWEIS](#)  
**Cc:** [Kelley, Marylia](#)  
**Subject:** [EXTERNAL] Timing for Draft SWEIS  
**Date:** Wednesday, April 14, 2021 3:40:27 PM

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Hi Fana,

Scott with Tri-Valley CAREs here.

I was hoping just to get an idea of the current expected timing for the draft SWEIS and the public comment period and hearings.

Any information you can pass along would be greatly appreciated.

Thanks,

--

Scott Yundt  
Staff Attorney

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"Stopping nuclear weapons where they start..."

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