

February 14, 2005

By email to: [comments-southwestern-santafe-espanola@fs.fed.us](mailto:comments-southwestern-santafe-espanola@fs.fed.us)

Mr. Sanford "Sandy" Hurlocker  
USDA Forest Service, Santa Fe National Forest  
Española Ranger District  
P. O. Box 3307  
Española, NM 87533

Re: Comments of Concerned Citizens for Nuclear Safety about the draft Environmental Impact Statement for the Buckman Water Diversion Project

Dear Mr. Hurlocker:

Concerned Citizens for Nuclear Safety (CCNS) make the following general comments about the draft Environmental Impact Statement (draft EIS) for the Buckman Water Diversion Project. CCNS is a Santa Fe-based non-governmental organization that formed in 1988 to voice citizens' concerns about the transportation of radioactive and hazardous waste from Los Alamos National Laboratory (LANL) through Santa Fe to the Waste Isolation Pilot Plant, located near Carlsbad, New Mexico. The mission of CCNS is to protect all living beings and the environment from the effects of radioactive and other hazardous materials now and in the future.

CCNS renews our request for an extension of time to comment on the draft EIS for the Buckman Water Diversion Project due to the problems in obtaining documents referenced in the draft EIS. We received copies of documents requested at the January 26, 2005 public meeting at the Genoveva Chavez Community Center. Unfortunately, important pages are missing from the "City of Santa Fe Implementation of Supplemental Buckman Wells" report, October 2002. These pages include 1-3, 1-6 to 1-8, which includes Table 1-5, which is referenced elsewhere in the document. Also missing are pages 2-13 and 2-16 to the end of that section. There may be other pages missing, but we cannot know unless we review the original document in the administrative record. It is very disappointing to receive a document that we have been requesting for over 2 years and to find out a few short days before the comment period ends, and over a weekend, that important pages are missing.

1. We find the draft EIS to be inadequate and technically indefensible because it does not take into consideration the conclusions and recommendations found in the following reports about contamination issues associated with LANL, a nuclear weapons facility

located on the west side of the Rio Grande, across from the proposed diversion site. CCNS believes that a thorough analysis must be done that incorporates information about LANL contaminants before over \$100 million is invested in the Buckman Water Diversion Project.

Some government officials and their contractors argue that because the Buckman Water Diversion Project is a surface water project, CCNS's concerns may be dismissed. However, recent New Mexico Environment Department (NMED) reports reveal that more plutonium has left the LANL site through the Pueblo/Los Alamos Canyon system since the May 2000 Cerro Grande fire than since the 1950s and 1960s. The Pueblo/Los Alamos Canyon system flows to and discharges into the Rio Grande less than two miles upstream of the proposed Diversion Project site.

In addition, over 18 million cubic feet of radioactive and hazardous waste has been buried in unlined trenches, shafts and pits on the Pajarito Plateau over the past 60 years by the Department of Energy (DOE). This amount is almost three times the waste than will be disposed at the Waste Isolation Pilot Plant (WIPP), located near Carlsbad, New Mexico. Sampling efforts by the NMED indicate that LANL contaminants are being found in the springs that discharge groundwater from the Pajarito Plateau and feed the Rio Grande.

Furthermore, Charlie Nylander, of the LANL Water Research Technical Assistance Office, recently reported at the October 14, 2004 meeting of 1000 Friends of New Mexico in Santa Fe that over 60% of the recharge for the Buckman Wellfield comes from the Pajarito Plateau.

Los Alamos County depends on groundwater for 100% of its drinking water. Pete Padilla, of Los Alamos County, reported on September 8, 2004 at the CCNS offices that Los Alamos County has shut off two of its municipal wells due to recent findings of contamination in them.

Therefore, CCNS strongly urges the Santa Fe National Forest of the U.S. Forest Service (FS) and the Taos Field Office of the Bureau of Land Management (BLM) to review, consider and incorporate the findings and conclusions found in the following reports in the final EIS for the Buckman Water Diversion Project:

- a. Recent LANL reports indicate that the drawdown of the Buckman Wellfield will draw LANL contaminants into the Wellfield.
  - "Analysis of Capture Zones of the Buckman Wellfield and a Proposed Horizontal Collector Well North of the Otowi Bridge," LA-UR-02-2750, by Velimir V. Vesselinov and Elizabeth H. Keating.
  - "Coupling Basin- and Site-Scale Inverse Models of the Española Aquifer," LA-UR-02-484, by Elizabeth H. Keating, et al.
- b. Recent CCNS report about LANL groundwater contamination data from the wells on the Pajarito Plateau and springs at the Rio Grande.

- “New Mexico’s Right to Know: The Potential for Groundwater Contaminants from Los Alamos National Laboratory to Reach the Rio Grande,” by George Rice, prepared for CCNS, July 2004, [www.nuclearactive.org](http://www.nuclearactive.org). This report compiles LANL and NMED data about groundwater contamination.

c. NMED reports. These reports document the highest levels of plutonium leaving LANL since the 1950’s and 1960’s through storm water events in the Pueblo/Los Alamos Canyon system, which discharges to the Rio Grande above the diversion site.

- “Post Cerro Grande Fire Channel Morphology in Lower Pueblo Canyon, Reach P-4 West: and Storm Water Transport of Plutonium 239/240 in Suspended Sediments, Los Alamos County, New Mexico,” by Dave Englert, Ralph Ford-Schmid and Kenny Bransford, November 2003, [http://www.nmenv.state.nm.us/DOE\\_Oversight/pubs.htm](http://www.nmenv.state.nm.us/DOE_Oversight/pubs.htm).
- “Post Cerro Grande Fire Channel Morphology in Lower Pueblo Canyon, Reach P-4 East, Los Alamos County, New Mexico,” by Ralph Ford-Schmid and Dave Englert, [http://www.nmenv.state.nm.us/DOE\\_Oversight/pubs.htm](http://www.nmenv.state.nm.us/DOE_Oversight/pubs.htm).

d. NMED report. This report demonstrates a chemical composition connection between LANL’s Test Well 1 and the CCNS Spring through the use of Stiff Diagrams. CCNS Spring is located about four miles hydraulically down-gradient from Test Well 1. It is located near the proposed diversion site. These findings may demonstrate a contaminant travel time of more than 350 feet per year.

- “Ground-Water Quality Atlas for Los Alamos County, New Mexico,” by Dennis McQuillan, Michael Dale, John Young and Kim Granzow, [http://www.nmenv.state.nm.us/gwb/GWQ%20Atlas/Los\\_Alamos\\_County.html](http://www.nmenv.state.nm.us/gwb/GWQ%20Atlas/Los_Alamos_County.html).

2. CCNS strongly urges the FS and BLM to augment the final EIS with a chapter on potential LANL impacts. We suggest that the FS and BLM consult with the County of Los Alamos about their water usage, San Juan-Chama water rights and contamination before the final EIS is prepared.

3. We are concerned about the limited distribution of the draft EIS. We note that the individual members of the Santa Fe and Española City Councils were not provided with copies of the draft. Copies of the draft EIS should be distributed to these decision makers at your earliest convenience. The final EIS should be distributed to them as well.

4. We were disappointed about the limited distribution of public service announcements (PSAs) regarding the availability of the documents and associated public meetings to radio stations. The distribution of information about the availability of the document and the meetings associated with them should be more accessible to the Northern New Mexico community. We strongly urge that any further PSAs be in English and Spanish and be sent to more radio stations in Santa Fe, including KSWV and KSFR, and in Española, KDCE as well.

5. In the final EIS, please explain the extent of the consultation with tribal organizations with respect to the draft EIS. Also, please explain the “follow-up

consultation [that] will be scheduled with any tribal organizations that express interest in the project.” p. 2 draft EIS. CCNS strongly suggests that consultation take place with recognized land grant holders as well.

6. We were disappointed to find that no glossary was included in the document. This is a technical document that includes terms that may not be known by the general public reviewing the document. We strongly suggest that a glossary be included in the final EIS.

7. We appreciate the extensive list of acronyms.

8. At the scoping meeting and on the October 16, 2002 tour, we expressed our concern that LANL is not represented on the maps about the proposal. In fact, we were surprised to see on Figure 2 that the label “Proposed Diversion Location” covers the LANL site. p. 18 draft EIS.

9. We strongly suggest that the Aamodt Settlement Area be included on the maps in the final EIS.

10. It is unclear in the draft what “near-term” means. It is also unclear if the diversion project will end in 2010 or if it will continue past that time. Is there a different definition of “near-term” for the City of Santa Fe, County of Santa Fe and Las Campanas? If so, those definitions should be included in the final EIS. p. 2 draft EIS.

The projected costs of the proposal should be included in this section as well.

11. Please explain the technical basis for the statement that “water conservation measures alone would not meet the purpose and need for the project.” p. 4 Alternatives Considered but Eliminated from Further Study, draft EIS.

12. Please explain in the final EIS why the San Ildefonso Area was eliminated from the alternatives considered. Please describe the water quality issues that were considered in this review. p. 29 draft EIS.

13. Please explain in the final EIS why under low flow conditions (approximately 200 cubic feet per second (cfs)) the diversion could withdraw up to 14% of the river’s flow ( $28.2 \text{ cfs} / 200 \text{ cfs} = 0.141$ ). p. 51 draft EIS.

14. Please explain in the final EIS why the City and County water use is projected to increase by 37% between 2001 and 2010 (12,000 acre-feet per year to 16,460 acre-feet per year). Is this a realistic projection? p. 101 draft EIS.

15. We note in a 2002 public meeting handout that the Santa Fe County Water Rights Demand Projections for the Community College District will quadruple between 2004 and 2040. Please explain this increase in the final EIS.

16. We note in Figure 3 that the proposed City/County Treatment Water Pipeline terminates a little south of I-25. The final EIS should explain what it planned for that terminus. p. 20 draft EIS.

17. CCNS believes that the impacts to water quality and quantity should be analyzed as issues in the final EIS, along with waste generation, storage and disposal as a result of acting on the proposal. Please examine these issues in the final EIS. p. 4 draft EIS. If the alternative for disposing of solids in the Caja del Rio Landfill is chosen, please explain how that disposal will impact the life of the landfill. p. 49 draft EIS.
18. The section on Water Resources should include an explanation about how the "Proposed Action would result in less reliance on ground water for local water supplies, and would have a beneficial effect on local ground water resources." It is unclear from the draft EIS about the current condition of the local ground water resources. A table would be helpful which would list how much water would be diverted per year to benefit the local ground water resources. Direct and Indirect Effects of the Proposed Action, p. 11 draft EIS.
19. Are there plans to divert water from the proposed project to the Santa Fe River in order to offset existing drawdown? p. 20 draft EIS.
20. CCNS believes that any damage to the Buckman Townsite is an unacceptable consequence of the proposed project. If any alternatives are chosen which will damage the Buckman Townsite, full mitigation plans must be included in the final EIS.
21. If the project proceeds forward, CCNS believes that all materials should be purchased from merchants within the City of Santa Fe and the County of Santa Fe. All workers on the project should be paid a living wage, at a minimum. p. 32 draft EIS.
22. The final EIS should explain where the gauges will be placed for monitoring the flows through the pipelines and through the booster stations. It should also explain where the pumping information will be posted for public inspection purposes. For example, the quantity of water in the reservoirs is published in the local newspapers. If the project proceeds forward, public notice of the diversion amounts should be published in the local newspapers along with the reservoir data. p. 48 draft EIS.
23. There seems to be a discrepancy between the figures found in Table 3, "Distribution of expected maximum monthly average diversions" on p. 50 and Table 10, "Estimated average monthly diversions" on p. 106. For December, the average diversion found in Table 10 exceeds the maximum amount in Table 3. Is this correct?
24. The final EIS should explain what will happen if the diversion is shut off due to low flows in the Rio Grande. The final EIS should also explain in detail what will happen to the Water Treatment Plants if the diversion project is shut off due to low flows in the Rio Grande. p. 51 draft EIS.
25. The final EIS should explain what protection will be placed around the Sediment Facility Alternative SF2. We are concerned that an 8 foot deep pond would be an attractive nuisance. p. 52 draft EIS.
26. The orientation of the maps in Figures 16 and 17 should be the same so that one may make a general comparison across the sediment facility alternatives. p. 53 draft EIS.

27. The final EIS should explain how many truck trips will be made per day to dispose of dried sand at the Caja del Rio Landfill. p. 54 draft EIS.
28. The final EIS should explain the historical impacts to the Denver & Rio Grande railroad grade (the Chili Line) by choosing the Treated Water Pipeline Alternative TWP3. These impacts should be carefully weighed against avoiding construction within Las Campanas Drive. pp. 55-56 draft EIS.
29. We were unable to distinguish the alternatives for the Treated Water Pipeline Alternatives in Figure 18 because the figure was printed in black and white. p. 57 draft EIS. We were also unable to distinguish the alternatives for the power upgrade facilities for the proposed action and alternative AGP1 in Figure 19 because it was printed in black and white. p. 60 draft EIS. We strongly urge the FS and BLM to print these figures in color in the final EIS.
30. What is the public process for commenting on the implementation plan found under the section "Mitigation Measures and Monitoring Requirements" found on p. 59. The final EIS should explain the process.
31. The final EIS should explain how the public will be notified about "river access delays." p. 66 draft EIS. Will the City and County be required to post public notices in the local newspapers?
32. The final EIS should explain and reference the specific ground water models that were used for the Flood Plains and Flooding analysis. p. 71 draft EIS.
33. The final EIS should show an example of the "historical architecture" that is proposed to be used on the Buckman townsite. p. 77 draft EIS.
34. The final EIS should list in each section the "individual analysis reports" that were used in the analysis. As explained at the beginning of these comments, our experience with the project record has been poor at best. p. 81 draft EIS.
35. The final EIS should include aquatic life in Table 13 "Santa Fe County special status plants and animals that could occur within the project area." p. 130 draft EIS.

Thank you for your careful consideration of our comments. Should you have any questions or concerns, please contact me by email at [jarends@nuclearactive.org](mailto:jarends@nuclearactive.org).

Sincerely,

Joni Arends  
Executive Director

cc: Santa Fe City Council members  
Española City Council members  
San Ildefonso Pueblo Tribal Council  
Tesuque Pueblo Tribal Council