March 7, 2018

Radiological Laboratory Utility and Office Building (RLUOB) Document Manager
NNSA Los Alamos Field Office
3747 West Jemez Road
Los Alamos, NM 87544

Via email to: RLUOBEA@hq.doe.gov

Re: Request extension of public comment period for RLUOB EA-2052

Dear RLUOB Document Manager:

We, the undersigned, respectfully request that the comment period be extended by 60 days for the draft Environmental Assessment (EA)-2052: Proposed Changes for Analytical Chemistry and Materials Characterization at the Radiological Laboratory/Utility/Office Building, Los Alamos National Laboratory, Los Alamos, New Mexico. We request that the new deadline for public comments be May 25, 2018.

To begin with, the current due date for public comments is March 26, during Holy Week, which of course has special meaning here in northern New Mexico.

We also believe this requested time extension is merited because:

1.            The scale of the RLUOB has grown dramatically with the proposed ten-fold rise in the administrative limit for use of special nuclear materials, resulting in a cap of up to 400 grams of plutonium-239 equivalent. The project has also grown in complexity in order to address seismic issues with related subprojects.

2.             The extensive modifications to PF-4 and the RLUOB call for new processes that members of the public will have to research in order to provide informed public comment. This will require even more work because NNSA has not provided the baseline impacts of these new processes.

3.            Moreover, the RLUOB upgrades are not scheduled to be completed any earlier than FY 2026. Given this, a 60-day extension, which we argue is the right thing to do, is inconsequential compared to the Project’s increased scope and long schedule. Consequently, we think that granting the extension places no significant burden on NNSA, while not granting the extension would harm the public’s ability to adequately comment.

4.            We also believe that an extension of time is warranted so that NNSA can hold a public information meeting on the draft RLUOB EA, which would aid the public in submitting better informed comments. NNSA should schedule that public information meeting as soon as possible.

5.            It should also be noted that a public hearing on the New Mexico Environment Department's draft DP-1132 for LANL's Radioactive Liquid Waste Treatment Facility is going to be held April 19 and 20 in Los Alamos. Holding two major public review and comment opportunities at roughly the same time burdens the public, especially during the spring Easter and Passover holidays.

6.             Finally, the reference documents in Section 6.0 should be checked and hyperlinked to facilitate internet availability. For example, googling the title of the second to last entry, Results of RLUOB Seismic Study With Updated Conclusions, LA-UR-16-28686, produces only the environmental assessment itself and not the needed reference document.

NNSA should get with modern times and provide a hyperlinked list of reference documents, further buttressing the need for an extended public comment period. New studies about the seismic risk on the Pajarito Plateau have been released since the 2003 final Chemistry and Metallurgy Research Replacement (CMRR) Project Environmental Impact Statement. These studies will require additional time for complete review and developing informed public comments.

Given the importance of the CMRR RLUOB and serious public interest, we believe that there will be a substantial number of citizens interested in providing public comment. We make this request so that those interested parties can provide informed public comments, with the ample time and needed reference documents to prepare. This will enhance the public participation process under the National Environmental Policy Act (NEPA) that we assume is a common goal that NNSA shares with us.

Please do not hesitate to contact me should you have any questions or comments. We look forward to your reply at your earliest convenience.

Sincerely,

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CC:      Ms. Michele Jacquez-Ortiz, Senator Tom Udall’s Office
            Mr. Dan Alpert, Sen. Martin Heinrich’s Office
            Mr. Graham Mason, Rep. Ben Ray Lujan’s Office