

August 30, 2022

The Honorable Jennifer M. Granholm  
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**Re: Request for two-month extension of the October 3, 2022 comment deadline for Scoping Comments to the Site-Wide Environmental Impact Statement for Continued Operations of Los Alamos National Laboratory (DOE/EIS-0380)**

Dear Secretary Granholm, Under Secretary Hruby, LAFO Manager Wyka, and Compliance Officer Dors,

The undersigned individuals and organizations request that the United States Department of Energy (DOE) and the National Nuclear Security Administration (NNSA) extend the comment period for Scoping Comments to the Site-Wide Environmental Impact Statement for Continued Operations of Los Alamos National Laboratory (LANL SWEIS). We request a new scoping comment deadline of Monday, December 5, 2022.

The 45-day scoping comment period that currently ends on October 3, 2022 is simply not enough time for the public to make meaningful comments on the scope of a proposal as large, complex and technical as the LANL SWEIS. The scope of the LANL SWEIS is of great national importance because it examines the environmental impacts associated with expanded plutonium pit production and cleanup at LANL.

The 2008 LANL SWEIS is a formidable document, with 1942 pages, not counting the 144-page Summary and the 1207-page Comment Response Document. That's a total of 3293 pages. This gives an idea of the amount of information analyses that are involved in preparing informed public scoping comments and why more time is needed.

Plus, with an annual budget at LANL of almost \$5 billion requested for FY2023, the scale of operations at LANL will require much more research than the public can do in 45 days.

Further, the public expects that the draft Hazardous Waste Permit for the Waste Isolation Pilot Plant (WIPP) – another document over 1000 pages - will be released by the New Mexico Environment Department (NMED) soon for public review and comment.

The August 19, 2022 Notice of Intent (NOI) lists 21 issues that have been identified for analysis in the LANL SWEIS. NNSA states that the list is “tentative and intended to facilitate public comment on the scope of the SWEIS” and that it is not intended to be all-inclusive. NNSA is specifically inviting suggestions for the addition or deletion of items on the list, which barely scratches the surface of issues that need to be analyzed.

Here are examples of other issues that must be included:

- The slow pace of cleanup, which prompted the NMED to sue DOE to terminate a 2016 Consent Order that governs environmental remediation at LANL.
- Truly comprehensive cleanup that will permanently protect precious water resources instead of the “cap and cover” that LANL proposes, leaving some 200,000 cubic yards of radioactive and toxic wastes buried in unlined pits, shafts and trenches.
- The growing threat of wildfires caused by climate change, including the May 2022 Cerro Pelado fire, which unfortunately New Mexico is growing all too familiar with.
- LANL's chronic track record of nuclear safety incidences. In the past this forced a three-year suspension of major operations at LANL's main plutonium facility, now the site for expanded plutonium pit production.
- Yet more generation of plutonium contaminated radioactive wastes that NNSA believes it may dispose of in the already oversubscribed WIPP.
- Environmental and social justice impacts on frontline communities, recognizing that New Mexico is a majority minority state. DOE plans to spend \$9.4 billion in FY 2023 in New Mexico (71% for core nuclear weapons research and production programs), substantially greater than the state's entire budget of \$8.5 billion. The inequitable economic impacts of such funding must be thoroughly evaluated.
- Massive construction projects due to expanded pit production plans, including new power lines and a bridge across the Rio Grande.
- Seismic impacts must be updated.

Fourteen years have passed since the publication of the 2008 final LANL SWEIS and there is no reason to rush the 2023 SWEIS process.

Sincerely,

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