

Henry P. Roybal
Commissioner, District 1

Anna Hansen
Commissioner, District 2

Rudy N. Garcia
Commissioner, District 3



Anna T. Hamilton
Commissioner, District 4

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Commissioner, District 5

Gregory S. Shaffer
County Manager

September 13, 2022

The Honorable Jennifer M. Granholm
Secretary, United States Department of
Energy (DOE)
James V. Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20585
The.Secretary@hq.doe.gov

Mr. Theodore Wyka
Manager, Los Alamos Field Office
National Nuclear Security
Administration
3747 West Jemez Road
Los Alamos, New Mexico 87544
Theodore.wyka@nnsa.doe.gov

The Honorable Jill Hruby
Under Secretary for Nuclear Security
U.S. DOE, National Nuclear Security
Administration
James V. Forrestal Building
1000 Independence Avenue, S.W.
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Kristen Dors
NEPA Compliance Officer
U.S. DOE, National Nuclear Security
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Los Alamos Field Office
3747 W Jemez Road
Los Alamos, New Mexico 87544
LANLSWEIS@nnsa.doe.gov

Subject: Comments on NNSA's Notice of Intent to Prepare a New Los Alamos National Laboratory (LANL) Site-Wide Environmental Impact Statement

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

The Board of County Commissioners (BCC) of Santa Fe County submits the following comments on the National Nuclear Security Administration (NNSA) Notice of Intent to Prepare a New Los Alamos National Laboratory Site-Wide Environmental Impact Statement (LANL SWEIS), published on August 19, 2022. We appreciate the opportunity to comment on the proposed scope of the new 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.

Santa Fe County, like almost all of New Mexico and most of the southwestern United States, is an arid region where water is our most precious – and increasingly scarce – resource. Santa Fe County and its approximate 150,000 residents obtains much of their drinking water from the Buckman Direct Diversion (BDD) project off of the Rio Grande. The BDD is located south of the

Otowi Bridge and is subject to contamination from LANL operations that affect Los Alamos Canyon and its tributaries. Currently, contamination is transported from LANL origin sites to the BDD. Increasing flood and storm events in the Los Alamos Canyon watershed are a major source of contaminants to the Rio Grande watershed. The flow of contaminated groundwater and its adverse effect on the Rio Grande watershed cannot be precluded by current findings. The County has a principal interest in what actions are taken to remediate this contamination.

The SWEIS must take into account the effect LANL contamination will have on surface water, such as the Rio Grande and the groundwater aquifers relied upon by the surrounding populations, including the citizens of Santa Fe County. The potential short and long term impacts must be considered. The long term impact must be monitored beyond the required 30-year window along with climate change impacts considered in any National Environmental Policy Act (NEPA) evaluation.

Local stakeholders, such as the County, must be engaged early and as often as possible to ensure that decisions are being influenced by those who will be affected by them. The impact of including local governments with their boots on the ground experience is invaluable to minimizing the long term impact of the proposed continuous operations at LANL and for potential community buy-in.

Here are some additional examples of other issues that must be included in the SWEIS:

- *Slow pace of cleanup.* LANL's slow pace of cleanup prompted the New Mexico Environment Department (NMED) to sue the Department of Energy (DOE) to terminate a 2016 Consent Order that governs environmental remediation at LANL. It is imperative that the SWEIS consider cleanup efforts on an expedited and prioritized basis.
- *Adequacy of the Consent Order.* The LANL SWEIS must include an analysis of whether or not the Consent Order is indeed adequate and timely and whether additional regulatory mechanisms must be employed to ensure the safety of LANL and surrounding communities, including the citizens of Santa Fe County, and to protect current and potential drinking water sources for surrounding communities. Additional analysis should be directed toward remediation so that present and future uses of potentially-affected resources are protected and sustainable.
- *Truly comprehensive cleanup.* The SWEIS must consider what it will take to permanently protect precious water resources. For example, the LANL proposal to leave some 200,000 cubic yards of radioactive and toxic wastes buried in unlined pits, shafts, and trenches is unacceptable. The SWEIS must analyze all possible alternatives to "cap and cover".
- *Construction projects.* To the extent that facilities are upgraded or constructed for plutonium pit production, construction projects are likely to cause significant environmental impacts

with any added power lines, roads, bridges (e.g., bridge across the Rio Grande), and traffic in already traffic-burdened roads leading to and from Los Alamos.

- *PFAS*. The SWEIS must examine where perfluoroalkyl and polyfluoroalkyl substances (PFAS) are used, and have been used, at LANL, and what LANL is doing to mitigate any PFAS contamination in surface and groundwater flowing from its facilities. In cooperation with the New Mexico Environment Department (NMED), the U.S. Geological Survey (USGS) tested groundwater and surface water around New Mexico and found PFAS in the Rio Grande above the Buckman Direct Diversion near Santa Fe. Additionally, according to an article in the Los Alamos Reporter from 2021, LANL has detected PFAS at its wastewater treatment plan.
 - *Wildfires*. The SWEIS must analyze the growing threat of highly destructive wildfires caused by climate change, including the May 2022 Cerro Pelado fire – which unfortunately New Mexico is growing all too familiar with – and the wildfire's impact on LANL operations. The Cerro Pelado fire came dangerously close to Los Alamos and threatened many contaminated LANL facilities and land.
 - *Flooding*. Numerous pathways exist that can transport LANL-origin contaminants to Santa Fe County's watershed. The most obvious is contaminated sediment migration into the Los Alamos Canyon – draining nearly half the historic footprint of LANL – during flood and storm events. The presence of such contaminants and their migration is well-documented. Flow of contaminated groundwater – for example, in the hexavalent chromium plume – and its adverse effect on the Rio Grande has not been ruled out. The LANL SWEIS must include an analysis of impacts on surface and groundwater resources, including floodplains, wetlands, and other canyon-bottom features as well as a detailed assessment of potential impacts to present and future use of the resource for drinking water. This analysis should include potential cumulative impacts, and how those impacts could affect off-site resources (e.g., the Rio Grande and well water sources for Santa Fe County).
 - *LANL's chronic track record of nuclear safety incidents*. In the past, these nuclear safety incidents forced a three-year suspension of major operations at LANL's main plutonium facility, now the site for expanded plutonium pit production. Over the past 10 years, glove box incidents have occurred with frequency, exposing workers to plutonium and other hazardous contaminants, according to LANL studies and Defense Nuclear Facilities Safety Board (DNFSB) reports. LANL, with oversight from NNSA and DNFSB, must successfully demonstrate that plutonium pit production can be done safely before pit production is restarted and significantly increased by 50% (20 or 30 pits per year).
 - *Adequacy and appropriateness of storage space and disposal*. Increased plutonium pit production will result in yet more generations of plutonium contaminated radioactive wastes that NNSA believes it may dispose of in the already oversubscribed Waste Isolation Pilot Plant (WIPP). Because existing structures are not designed to store the large amounts of pits
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505-995-2740 www.santafecountynm.gov

and waste material that result from large-scale pit manufacturing operations, these factors should be considered and resolved prior to ramping up production. Additionally, in 2020, the DNFSB noted that LANL “does not adequately analyze energetic chemical reaction hazards involving transuranic waste,” such as the improperly prepared radioactive waste drums from LANL that in 2014 ruptured, which contaminated and closed the Waste Isolation Pilot Plant for nearly three years.

- *Environmental and social justice impacts on frontline communities.* 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, recognizing that New Mexico ranks 49th in the percentage of people who have incomes below the poverty line, 50th in pre-K to 12th grade education, and 50th in child well-being.
- *Seismic impacts.* Active seismic zones lie beneath the current plutonium production facility and other industrial and experimental areas. A large earthquake could damage these facilities and launch radioactive, cancer-causing plutonium particles and other hazardous contaminants throughout nearby residential communities. Please note: plutonium particles have been found in the soils around the Truchas lakes. Therefore, seismic impacts must be updated, analyzed, and possibly considered.

Due to the wide-ranging scope of the LANL SWEIS, the highly technical issues the SWEIS is expected to address, and the need and time it takes for government entities to deliberate and make transparent their comments, the County suggests the draft SWEIS be released for at least a 120-day-comment period in order to allow all stakeholders to analyze and provide their comments on the SWEIS. Further, the County supports the requests by 115 non-governmental organizations and individuals for a 60-day extension of the scoping comment period so that all voices are heard.

Fourteen years have passed since the publication of the 2008 final LANL SWEIS and there is no reason to rush the 2023 SWEIS process. A more thorough and well considered process can only result in a benefit to all those involved and affected by the SWEIS. We appreciate your consideration of our comments.

Respectfully,



Anna T. Hamilton, Chair
Board of County Commissioners for Santa Fe County



Commissioner Anna Hansen, Santa Fe County, District 2
505-920-0957 mobile

This letter has been sent to:

Governor Michele Lujan Grisham

Senator Martin Heinrich

Senator Ben Ray Lujan

Congresswomen Teresa Leger Fernandez, Melanie Stansbury, and Yvette Herrell

Members of the NM Interim Legislative Radioactive & Hazardous Materials Committee

Governor of San Ildefonso Pueblo

Governor of Tesuque Pueblo

Governor of Nambe Pueblo

Governor of Cochiti Pueblo

All Pueblo Council of Governors

U.S. Senate Armed Services Committee

U.S. House Armed Services Committee

**THE BOARD OF COUNTY COMMISSIONERS OF
SANTA FE COUNTY
RESOLUTION NO. 2017 - 129**

A RESOLUTION REQUESTING THAT THE NEW MEXICO ENVIRONMENT DEPARTMENT STRENGTHEN THE REVISED LOS ALAMOS NATIONAL LABORATORY CLEANUP CONSENT ORDER TO CALL FOR ADDITIONAL CHARACTERIZATION OF LEGACY NUCLEAR WASTES; REQUESTING THE DEPARTMENT OF ENERGY TO REQUEST INCREASE CLEANUP FUNDING FROM CONGRESS, AND SIGNIFICANTLY INCREASE SAFETY TRAINING; AND DIRECTING THE COUNTY MANAGER TO TRANSMIT COPIES OF THIS RESOLUTION TO ASSOCIATED PARTIES

WHEREAS, in June 2016, the Department of Energy (DOE) and New Mexico Environment Department (NMED) signed a new revised Consent Order governing cleanup that incorporates several loopholes whereby Los Alamos National Laboratory (LANL) can avoid comprehensive, complete cleanup by simply claiming that it is too difficult or costly; and

WHEREAS, the new Consent Order bases LANL cleanup on projections of future funding availability instead of what is actually needed to accomplish comprehensive, complete cleanup; and

WHEREAS, in August 2016, based on the new Consent Order, DOE released an estimated cleanup baseline that extended the timeframe for the completion of cleanup at LANL to 2040, asserting that only 5,000 cubic meters of waste needs to be cleaned up, while an estimated 30 times (150,000 cubic meters) that much legacy waste¹ is anticipated to be subject to “cap and cover”, which means leaving the waste buried where it is currently located on LANL property, above the drinking water supply of Santa Fe and Los Alamos Counties; and

WHEREAS, the DOE is expanding the production of new plutonium pit triggers at LANL for the nation’s nuclear weapons from 20 to up to 80 pits per year, which is estimated to nearly double the associated generation of radioactive and toxic wastes²; and

WHEREAS, plutonium pits are used as the “triggers” for the nation’s nuclear weapons; and

WHEREAS, plutonium is a radioactive and heavy metal substance with significant health and environmental risks; and

WHEREAS, independent experts outside of the Department of Defense have found that all plutonium pits, including those created when the existing nuclear stockpile was created over the last 72 years, have reliable lifetimes of a century or more, arguing that expanded production

¹ “Legacy waste” is radioactive, hazardous and/or toxic waste or mixed (radioactive and hazardous) waste that was generated, stored and/or disposed during the Cold War.

SFC CLERK RECORDED 11/15/2017

of plutonium pits is unnecessary; and

WHEREAS, the DOE has determined that “Required improvements to the [Nuclear] Criticality Safety Program are moving at an unacceptably slow rate” and that “The number and latency of infractions in the plutonium facility is of concern”, for which LANL received the only “red grade” (lowest score) in nuclear criticality safety in the DOE nuclear weapons complex in the 2016 report of the Department of Energy submitted to the Defense Nuclear Safety Facilities Board (DNSFB)²; and

WHEREAS, the nuclear weapons complex at LANL has suffered several accidents in recent years, documented in a multi-part series from the Center for Public Integrity,³ including the following events:

1. In March 2011, in violation of nuclear material handling protocols, a manager placed an amount of nuclear material in a glovebox⁴ that exceeded the criticality limit of the box;
2. In August 2011, technicians, seeking a photo-op, in violation of nuclear material handling protocols, placed eight rods of plutonium in close proximity to each other—several more rods would have triggered a deadly nuclear chain reaction;
3. A 2013 LANL study found that glovebox leaks in the Plutonium Facility (PF-4) occurred roughly three times a month, often the result of avoidable errors;
4. In December 2013, LANL sent a drum containing radioactive material to the Waste Isolation Pilot Plant (WIPP) disposal facility near Carlsbad that ruptured inside the facility—a result of improper mixing of ingredients—costing the federal government approximately \$1.5 billion to clean up;
5. In May 2016, a trolley used to carry nuclear materials in a facility at LANL fell from the ceiling and crashed into a glovebox, which was fortunately empty and not in use;
6. The DOE annual report to the DNSFB, released in February 2017, found that LANL was the only nuclear production site whose performance did not meet expectations in the functional area of criticality safety expectations⁵;
7. In July 2017, a LANL employee sent “special nuclear material” across the country by air in direct violation of nuclear safety standards; and
8. In August 2017, two further incidents of mishandling of plutonium metals occurred, one of which was acknowledged as a ‘criticality safety event’; and
9. On September 23, 2017 three “pipefitters released airborne radioactive material when they removed a plug from a service panel on the base of a glovebox” and this incident involved “the same work crew and glovebox involved in the contamination August event.”⁶

² “2016 Annual Metrics Report to the Defense Nuclear Facilities Safety Board, January 2017, Nuclear Criticality Safety Programs,” https://www.dnfsb.gov/sites/default/files/document/10666/DOE%20Letter_2016%20Metrics%20Report_Feb-1-2017.pdf, see p. 4.

³ Center for Public Integrity, six-part “Nuclear Negligence” series at <https://apps.publicintegrity.org/nuclear-negligence/>

⁴ A “glovebox” is a specially constructed container that permits the safe handling of hazardous and toxic materials, including radioactive materials, utilizing gloves that employees slip their hands into, allowing them to touch and manipulate those materials.

⁵ https://www.dnfsb.gov/sites/default/files/document/10666/DOE%20Letter_2016%20Metrics%20Report_Feb-1-2017.pdf

⁶ September 29, 2017 DNFSB “Los Alamos Report for Week Ending September 29, 2017” and “Los Alamos Report for Week Ending September 1, 2017” at <https://www.dnfsb.gov/sites/default/files/document/12881/Los%20Alamos%20Week%20Ending%20September%201%202017.pdf> and

WHEREAS, DOE should request increased funding from Congress and allocate sufficient funding to ensure all contractor staff working with radioactive and hazardous material are trained in the handling of said material, and overseen by more federal nuclear safety experts, in order to ensure the safety of the employees, downwind and downstream communities, the nuclear stockpile and the surrounding communities, including Santa Fe County; and

WHEREAS, DOE should ensure that DOE staffing targets are fully met on a priority basis, as the February 2017 report of DOE to the DNSFB noted that targeted staffing levels had not been met⁷; and

WHEREAS, radioactive and hazardous contaminants produced as a result of nuclear weapons research and production at LANL have been and continue to be released into the Rio Grande and the Española Basin Aquifer⁸, designated by the Environmental Protection Agency as a Sole Source Aquifer⁹; and

WHEREAS, LANL's legacy radioactive and toxic wastes are located as close as eighteen miles from the Santa Fe Plaza and 5 miles from the Buckman Well Field and Buckman Direct Diversion Project; and

WHEREAS, LANL's radioactive and toxic wastes are buried in unlined pits, trenches and shafts, unlike the composite liners and leachate collection systems that the (NMED) requires of all local governments; and

WHEREAS, the Governing Body of the County of Santa Fe supports the complete and permanent cleanup of all hazardous, toxic and radioactive wastes related to nuclear weapons research and production at Los Alamos; and

WHEREAS, sustainable futures for the Counties of Santa Fe, Rio Arriba, Sandoval and Los Alamos, six Pueblo nations and the broader region depend on preventing groundwater contamination of the Española Basin Aquifer and the Rio Grande; and

WHEREAS, at the October 5, 2017 meeting of the Buckman Direct Diversion Board (BDDDB), a motion was unanimously approved that authorized the Board Chair to sign the proposed Memorandum Of Understanding Between The U.S. Department Of Energy And The

<https://www.dnfsb.gov/sites/default/files/document/13166/Los%20Alamos%20Week%20Ending%20September%2029%2C%202017.pdf>

https://www.dnfsb.gov/sites/default/files/document/10666/DOE%20Letter_2016%20Metrics%20Report_Feb-1-2017.pdf

⁸ "Interim Measures Work Plan for the Evaluation of Chromium Mass Removal," LA-UR-13-22534, April 2013, EP2013-0073, p. 1, see also Fig. 1.0-1 (p. 13) and Fig. 1.0-2 (p. 14).

Related NMED Ground Water Quality Bureau permits:

1. DP-1835: Extraction Wells and Injection Wells for Chromium Project
2. DP-1793: Land Application of Treated Chromium Project waters in Mortandad Canyon

⁹ A Sole Source Aquifer is defined by the EPA as an aquifer that supplies at least 50% of the drinking water for its service area and where there are no reasonably available alternative drinking water sources should the aquifer become contaminated. <https://www.federalregister.gov/documents/2008/01/22/E8-999/determination-of-sole-source-aquifer-petition>

Buckman Direct Diversion Board Regarding Notification And Water Quality Monitoring after review and agreement on six proposed edits; and

WHEREAS, at the October 5, 2017 meeting of the BDDDB, a representative from the Los Alamos DOE office committed that status updates would be provided to BDDDB as requested regarding the overall cleanup program, including the hexavalent chromium plume in Mortandad Canyon with concentrations above regulatory levels; and

WHEREAS, complete cleanup of LANL would benefit all New Mexicans, permanently protecting precious surface and groundwater resources and the Rio Grande while creating hundreds of high paying jobs for twenty years or more if the wastes were completely removed.

NOW, THEREFORE, BE IT RESOLVED that the Santa Fe County Board of County Commissioners (Board) hereby requests (a) that the NMED strengthen the revised 2016 Cleanup Consent Order to require additional characterization of legacy nuclear wastes; (b) that DOE request increased cleanup funding from Congress; and (c), that DOE significantly increase safety training for all employees at LANL.

BE IT FURTHER RESOLVED by the Board that the County Manager is hereby directed to send copies of this Resolution to the New Mexican Congressional Delegation, the Governor of New Mexico, the President Pro Tempore of the New Mexico Senate, the Speaker of the New Mexico House of Representatives, and the Secretaries of the United States Department of Energy, Department of Defense, The Defense Nuclear Facilities Safety Board, Environmental Protection Agency and the New Mexico Environment Department.

PASSED, APPROVED, AND ADOPTED THIS 14th DAY OF November, 2017.

BOARD OF COUNTY COMMISSIONERS
OF SANTA FE COUNTY

By: [Signature]
Henry P. Roybal, Chair

ATTEST:
[Signature] Date: 11/14/2017
Geraldine Salazar, Santa Fe County Clerk

COUNTY OF SANTA FE)
STATE OF NEW MEXICO) ss BCC RESOLUTIONS
PAGES: 5


I Hereby Certify That This Instrument Was Filed for Record On The 15TH Day Of November, 2017 at 11:38:12 AM And Was Duly Recorded as Instrument # 1841438 Of The Records Of Santa Fe County

Deputy [Signature] Witness My Hand And Seal Of Office Geraldine Salazar County Clerk, Santa Fe, NM



SFC CLERK RECORDED 11/15/2017

APPROVED AS TO FORM:



R. Bruce Frederick, Santa Fe County Attorney

Date: 11/14/2017

SFC CLERK RECORDED 11/15/2017

THE BOARD OF COUNTY COMMISSIONERS
OF SANTA FE COUNTY

RESOLUTION NO. 2021 - 01

Introduced by:
Commissioner Anna Hansen and Commissioner Anna Hamilton

**A RESOLUTION
REQUESTING THAT THE NATIONAL NUCLEAR SECURITY ADMINISTRATION
PREPARE AND COMPLETE A NEW SITE-WIDE ENVIRONMENTAL IMPACT
STATEMENT FOR LOS ALAMOS NATIONAL LABORATORY BEFORE EXPANDING
PLUTONIUM PIT PRODUCTION AT THE FACILITY**

WHEREAS, Santa Fe County (“County”) has a longstanding tradition of promoting democracy and environmental protection in pending nuclear weapon decisions by requesting that “local governments be kept fully informed about [projects] to facilitate large-scale production of additional plutonium warhead cores at Los Alamos National Laboratory (“LANL”), so as to make citizens aware of potential safety and environmental hazards associated with the handling of plutonium and other dangerous materials in a timely fashion” (Resolution No. 2010-221); and

WHEREAS, the County has previously joined with the City of Santa Fe to support LANL expansion Environmental Impact Statements (“EISs”), calling for “a new EIS” to “reassure the citizens of Santa Fe County that the safety and environmental issues entailed in this growing project are being planned for in a careful and comprehensive way.” (Resolution No. 2010-221); and

WHEREAS, Resolution No. 2017-129 specifically documented nine nuclear safety incidents at LANL, including a 2017 National Nuclear Security Administration (“NNSA”) report to the independent Defense Nuclear Facilities Safety Board (“DNFSB”) that found that LANL was the only nuclear weapons production site that did not meet critical safety expectations; and

WHEREAS, Resolution No. 2019-43 urged the Department of Energy (“DOE”) Secretary to suspend DOE Order 140.1 and reissue an order that fully complies with the DNFSB’s legal authority under statute to continue to protect LANL workers and the community by providing the DNFSB access to information, personnel, and facilities; and

WHEREAS, the DNFSB has recently reported the possibility of exposure of potentially lethal radioactive doses as high as 760 rem to workers at LANL's plutonium pit production facility ("PF-4"), with a possible public exposure of 24 rem, because LANL "do[es] not appropriately analyze energetic chemical reaction hazards involving transuranic waste," such as the improperly prepared radioactive waste drums from LANL that in 2014 ruptured, which contaminated and closed the Waste Isolation Pilot Plant for nearly three years; and

WHEREAS, DNFSB's calculations of potential exposure to workers and the public are orders of magnitude greater than those disclosed by the NNSA in any of its past analyses related to expanded plutonium pit production; and

WHEREAS, plutonium pits are used as the "triggers" for the nation's nuclear weapons; and

WHEREAS, plutonium is a substance with significant health, safety, and environmental risks; and

WHEREAS, independent experts have found that plutonium pits have an estimated lifetime of at least 60 years, and many reports support that they last a century, thus making expanded production unnecessary, and providing more than sufficient time (over 20 years) to do a SWEIS; and

WHEREAS, plutonium pit production will continue to generate radioactive, hazardous and toxic wastes that generally will be transported and disposed of off-site; and

WHEREAS, radioactive, hazardous and toxic wastes generated by nuclear weapons activities over seven decades have been buried in unlined pits, trenches, and shafts in the volcanic tuff of the Pajarito Plateau, which pits are leaking, resulting in the waste migrating to the regional drinking water aquifer and the Rio Grande; and

WHEREAS, the independent Government Accountability Office ("GAO") has recently reported that "in the last 2 decades, LANL has twice had to suspend laboratory-wide operations after the

discovery of significant safety issues” and “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

WHEREAS, federal agencies are required by the National Environmental Policy Act (“NEPA”) to allow the public the opportunity to review, analyze, and provide informed comments about major federal proposals such as expanded plutonium pit production; and

WHEREAS, the NNSA has refused to begin a new Site-Wide Environmental Impact Statement (“SWEIS”) for LANL, instead relying on an outdated 2008 SWEIS; and

WHEREAS, NEPA requires new analysis when there is new information and changed circumstances, which in this case includes a major wildfire; up to \$13 billion in proposed new construction at LANL; increasing seismic risks on the Pajarito Plateau, including seismic faults near PF-4; the discovery of serious groundwater contamination; planned massive releases of radioactive tritium into the air; etc.; and

WHEREAS, past SWEISs have benefitted both the public and the DOE, one dramatic example being that public comment about a 1999 draft SWEIS prompting LANL to undertake fire prevention measures that arguably prevented the 2000 Cerro Grande Fire from reaching some 40,000 barrels of plutonium-contaminated wastes stored aboveground at Area G, a potential catastrophe that LANL itself acknowledged that public comment required by NEPA helped to avert; and

WHEREAS, a SWEIS process which considers all reasonable alternatives to NNSA’s proposed actions and incorporates mitigation plans is the only available means by which the public, tribes, and local and state governments can review and understand the nature and consequences of NNSA’s proposed actions and provide their comments; and

WHEREAS, the citizens of Santa Fe County should benefit from the National Laboratory’s presence through educational outreach, greater environmental remediation funding, workforce training and development and small business opportunities.

NOW, THEREFORE, BE IT RESOLVED that the Board of County Commissioners of Santa Fe County, hereby requests that, in accordance with the requirements of the National Environmental Policy Act, the National Nuclear Security Administration immediately begin and complete a new Site-Wide Environmental Impact Statement for Continued Operations at the Los Alamos National Laboratory and, while it does so, it take more concerted action to benefit the citizens of Santa Fe County.

BE IT FURTHER RESOLVED that the Board of County Commissioners of Santa Fe County request that the National Nuclear Security Administration work closely with the Defense Nuclear Facilities Safety Board to correct nuclear safety concerns that will better protect the workers and citizens of Santa Fe County and speed the removal of hazardous materials generated by LANL.

BE IT FURTHER RESOLVED that the Board of County Commissioners of Santa Fe County request that the National Nuclear Security Administration and the Department of Energy significantly increase the budget for environmental remediation of the site.

BE IT FURTHER RESOLVED that the Board of County Commissioners of Santa Fe County request that the National Nuclear Security Administration and the Department of Energy expand both their educational outreach opportunities and workforce training efforts to further benefit the citizens of Santa Fe County.

BE IT FURTHER RESOLVED that the Board of County Commissioners of Santa Fe County request that the National Nuclear Security Administration further expand the procurement opportunities for our local small businesses vital to the generation of Gross Receipts Taxes needed for county operations.

BE IT FURTHER RESOLVED that the Board of County Commissioners of Santa Fe County request that the National Nuclear Security Administration suspend any planned expanded plutonium pit production until all outstanding nuclear safety issues are resolved, as certified by the independent Defense Nuclear Facilities Safety Board.

SFC CLERK RECORDED 01/28/2021

