

ENERGY COMMUNITIES ALLIANCE

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April 9, 2008

VIA EMAIL

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue, SW.
Washington, DC 20585

RE: Energy Communities Alliance's Comments on the National Nuclear Security Administration's Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS, DOE/EIS-0236-S4)

Dear Mr. Wyka:

Energy Communities Alliance ("ECA") expresses its general support of the preferred alternative contained in the above-referenced Complex Transformation Supplemental Programmatic Environmental Impact Statement ("SPEIS"), which was published on January 11, 2008 (73 FR 2023). The preferred alternative effectively addresses the need to create a more efficient and cost-effective weapons complex, while maintaining essential national nuclear security missions at our national laboratories, plants, and test sites, all of which are hosted by local governments and communities.

ECA is the non-profit association of local governments that surround Department of Energy ("DOE") and National Nuclear Security ("NNSA") facilities. Our membership includes local governments and community organizations which host almost all NNSA sites. Accordingly, ECA's membership is directly impacted by the decisions that will be made as a result of this SPEIS, particularly with respect to those decisions that bear on a local government's duty to provide for the public health, safety, infrastructure, and economic well-being of the community.

As NNSA further develops its SPEIS and issues a subsequent Record of Decision ("ROD"), ECA offers general comments for your consideration, which are divided into three categories, as follows:

(1) WORKFORCE

Issue. The vision of NNSA's Complex Transformation Plan (the preferred alternative)("Plan") and the details contained in the draft SPEIS contemplate both significant

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spikes in local workforce needs as well as substantial layoffs over the long-term. With regard to construction of new facilities and demolition of aging infrastructure, the draft SPEIS indicates in its socioeconomic impact analysis that many thousands of construction workers could be required to implement the various alternatives depending on the particular site in question.¹ On the other hand, the Plan also envisions an overall reduction in nuclear personnel by 20-30 percent due to a significant footprint reduction and increased programmatic efficiencies.²

Recommendation. Due to the community impacts of growth and contractions in the workforce, ECA requests that the final EIS explore in greater detail the estimated workforce fluctuations both in public and private sector employment. In the event of massive layoffs, ECA also requests that DOE/NNSA identifies in its ROD mitigation of such impacts, and to consult directly through in-person meetings (not just web site postings) with affected units of local governments when developing workforce restructuring plans. Both growth and reductions in the workforce are important local government issues because of the associated infrastructure and community planning impacts, as explained in the following section.

(2) INFRASTRUCTURE

Issue. Community infrastructure, as opposed to the infrastructure of the weapons complex, will be impacted greatly by growth and reductions in communities. These impacts include, but are not limited to, changes in housing, road and school capacity, as well as changes in municipal service requirements such as fire protection, trash collection, and utilities agreements (e.g. electricity and water services). To illustrate this point, the draft SPEIS in its cumulative impacts analysis finds, among other things, that depending on the selected scenario there could be stress on the available housing stock in an impacted region as well as the need for additional teachers and classrooms in order to cope with an increased student population.³

Recommendation. Because these community infrastructure impacts require extensive planning on the parts of cities and counties that host NNSA activities, ECA respectfully requests that NNSA expand its analysis to provide more certainty in terms of the anticipated influx and reductions in community growth, and the associated impacts on schools, housing, utilities, and other municipal services. Further, given these anticipated impacts, the federal government should mitigate the unfunded mandate that will be imposed on local governments to build public infrastructure, including schools and roadways.

(3) PROPERTY DISPOSAL

Issue. In addition to community-based infrastructure, the infrastructure and land use of the weapons complex will be greatly impacted. Specifically, the Complex Transformation Plan, if implemented, envisions a reduction in the footprint of NNSA buildings and structures by about

¹ Complex Transformation Draft SPEIS, DOE/EIS-0236-S4, Table S.3.16-1 – Comparison of Environmental Impacts Among Programmatic Alternatives

² NNSA Public Hearings Presentation, pg. 23

³ Complex Transformation Draft SPEIS, DOE/EIS-0236-S4, Chapter 6, pg. 8

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one-third (from more than 35 million to less than 26 million square feet).⁴ This reduction in footprint will translate into facilities and other real property becoming excess or surplus of NNSA's needs, thus making them available for transfer and redevelopment. Communities, who are largely dependent on DOE/NNSA activities as the fabric of their local economies, may be interested in acquiring such excess or surplus property in order to mitigate the potentially devastating impacts of losing significant amounts nuclear personnel.

Recommendation. In order to better understand the details of excess or surplus property, NNSA should work directly with local governments to identify the available real (and in some cases personal) property for disposal. Similar to the experience at Department of Defense and Department of Energy closure sites, ECA requests that NNSA utilize 10 CFR Part 770 to transfer land at no-cost to local governments for economic development and other purposes. With regard to this EIS process and the expected ROD, we encourage NNSA to explore these direct property transfers to mitigate any downsizing or impacts of the preferred alternative.

CONCLUSION

ECA requests that NNSA consider the comments and the role of local governments and the impact to local communities as it further develops its environmental impact analysis in the ROD. Moreover, while many of ECA's local government members have submitted independent comments regarding their respective facilities, this letter serves to provide general comments from a national perspective.

ECA thanks you for the opportunity to comment. We also commend NNSA for its public outreach to date and its senior-level consultations with local governments and communities with regard to this important initiative. ECA staff can be reached at (202) 828-2423 should you have any questions or comments.

Sincerely,



Seth Kirshenberg, Esq.
Executive Director, ECA

cc: Lorraine Anderson, ECA Chair
Thomas D'Agostino, Administrator, NNSA
David Campbell, Congressional & Intergovernmental Affairs, NNSA
ECA Board of Directors

⁴ See, supra note 2