

Dear Mr. John Tegtmeir,

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I have attached comments from Tewa Women United for the CMRR-NF. I do hope they are taken seriously and worthy of some more dialogues into the environmental impacts to our health and well being as we do our daily living in our northern New Mexico and indigenous homelands. Thank you
Kathy Sanchez, Tewa Women United

11/17/2010

November 15, 2010

Mr. John Tegtmeier

CMRR-NF SEIS Document Manager
 Los Alamos Site Office
 3747 West Jemez Road
 TA-3 Building 1410
 Los Alamos, NM. 87544

Dear Mr. Tegtmeier,

In regards to the applicability of a Supplemental Environmental Impact Statement (SEIS), we members of downwind and downriver impacted communities, request that all construction and work on a new CMRR be halted until a new EIS statement is released, reviewed, and communicated to the impacted populations.

Our health and well being are directly affected by the environmental consequences of such hazardous work. There is a great need to significantly increase in the way we are given opportunities for direct input and involvement in decision making procedures that directly impact sacred connectiveness to our Earth Mother. Additional scoping meetings need to be held in every community within a 100-mile radius of Los Alamos National Laboratory, Sandia National Laboratory, the WIPP sites, and in Uranium mining communities both in state and out of state. Public comment should be allowed as ongoing throughout the finalization of this process considering the size and scope of the CMRR facility. We also request that more in depth and comprehensive responses to all public comments are published alongside each other on the website and in the EIS in order to facilitate understanding and to maintain transparency on the actual impact of these comments.

It is vital that the state permits LANL will be applying for be included in the new EIS, with specific information therein regarding what will be released into the environment on a daily/regular basis. Information needs to be included that details the longevity of any radioactive or other toxins that will be released as a result of this new building. The lifespan of this facility must be taken into account in order to assess not only short term releases but also include the plan for decommissioning the building and/or improving it in 50 years, and what will be done with the waste generated in that time. Financial assurance needs to be guaranteed so that our communities are guaranteed cleanup, containment, disposal and treatment of accidental releases and exposures. We request a complete analysis of what support facilities, as well as their capacity and capabilities, will be needed for the proposed CMRR, including the cost and any additional environmental impacts or changes as a result of the need for this increased support. Similar to what happened to the communities at the Trinity site, where there was no plan in place to determine the impacts on local populations, and who now face cancer rates four times the national average, their



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needs to be solid information that ensures there will be zero harm on our well being as a result of this industry.

We, as members of the communities directly impacted, oppose the compartmentalization of public commentary. Of major concern is how comments are labeled as being "beyond the scope of the CMRR- EIS", because this does not leave room for our worldview and knowledge that is held by land-based people regarding the holistic implications of what is being done to Mother lands. In addition to not holding equal value to the knowledge and contributions of local communities, the manner in which the technical material is presented, only serves to disenfranchise a population suffering from economic, social, educational and linguistic disparities. This is documented in the fact that a good majority of CMRR-EIS public comments reference that more time is needed for comment, community education and outreach, and comprehensive in-depth health studies. Another problematic factor is the methodology in which the public's comments were responded to. The public's comments were superficially abstracted, and the commenter's were instructed to refer back to the EIS document. This sort of response allowed for a one-dimensional understanding of what the commenter's were asking or stating. Much of the cultural commentary was disregarded and never addressed in this summarization of public comment. It trivialized their statements, concerns, and inquiries about the EIS by responding in a way that directed them back to the document. This serves to end dialogue rather than enhance it, and denies the public a meaningful response to their comments. It inappropriately patronizes the general population, and unfairly discredits the knowledge bases of our community experts on these matters.

Based on the findings in the Los Alamos Historical Document and Retrieval Assessment report (LAHDRA), which states that environmental releases in early production years at LANL exceed those of Hanford, Rocky Flats, and Savannah River combined, making us the most polluted nuclear site in the nation. This fact warrants LANL's immediate action on legacy waste clean up before any new facility can be built that will only add to this contamination. We are in support of Concerned Citizens for Nuclear Safety and Nuclear Watch New Mexico's statement that "the Department of Energy (DOE) must explain the impacts of diverting funds away from cleanup, renewable energy, and nonproliferation programs at LANL for a new manufacturing facility for plutonium pits or "triggers" for nuclear weapons called the CMRR."

A new EIS statement will be more relevant if the current standard of reference for determining safe levels of exposure to both workers and the general population is transformed and stopped from using "fake" models of allowable harm. The current standard is based on "reference man", a hypothetical or "just made up man" model which greatly endangers the majority of the population in its' limitations. This standard does not protect women, children, the elderly, people of color, the unborn fetus, or any other demographic that falls outside of these narrow parameters from harm. If the EIS continues to use these inadequate ways

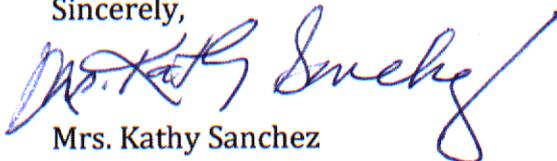
of measuring contamination, then it endangers and threatens local populations. This model of reference is limited in its' focus on artificial male human life. The new EIS report needs to factor in the impacts on the plant, insect, and animal communities with whom we share a delicate ecology. Our water, air and soil health are vital considerations that need to be included in any revised impact statements. In addition, the current EIS standards of measurement are unsatisfactory because it does not include impacts of multiple exposures to radiological, toxic, and hazardous materials. The unique pathways of exposure that land-based people face as a result of growing and harvesting our own food, hunting, fishing, gathering wild plant-life, being outdoors for longer periods of time, livelihoods that include pottery, woodwork, natural pigments, the harvesting of forest materials, drinking water, breathing air, and ceremonial cultural practices within the pueblos all need to be analyzed, considered and respected. This needs to be done by creating meaningful dialogue and processes with local communities.

We have stated reasons for the new EIS, but feel it is also necessary to express our opposition for the need for a new CMRR building in the first place. The cost is too high, historical impacts and legacy waste have yet to be addressed, and the region is unsuitable seismically, geographically, and culturally for the continuation of the nuclear industry in the Jemez Mountain Plateau. We ask in prayer that LANL shift its focus from a "for profit" industry whose core is based on destructive values within a culture of violence to one that respects the sustainability of life.

As people who live in the shadow of this misguided industry and who do not share its values, we ask that LANL's shift in mission begins with open dialogue and sincere consideration of our requests and concerns. Let this shift in mission begin with recognizing that this new facility is not needed or wanted here. We ask that our concerns be not trivialized and silenced as has been done in the past. We look forward to furthering this discussion and to creative solutions to this issue that we are all affected by and involved in together.

In solidarity with other concerned humans, Mother Earth and all life forms who inhabit these sacred homelands. We ask for your full mind, heart and spiritual deliberation.

Sincerely,



Mrs. Kathy Sanchez
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Tewa Women United