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May 25, 2018

Mr. Martin Krentz, DOE Document Manager
West Valley Demonstration Project
U.S. Department of Energy
10282 Rock Springs Road
AC-DOE
West Valley, NY 14171-9979

RE: *Scoping for DOE/NYSERDA SEIS for Decommissioning and/or Long-Term Stewardship at the West Valley Demonstration Project and WNY Nuclear Service Center*

Dear Mr. Krentz:

On behalf of the undersigned organizations, we are writing to express our strong support for full cleanup of the West Valley nuclear waste site. The site contains vast amounts of radioactive and hazardous waste, which threaten our Great Lakes, public health, economy, and our quality of life. ***The safest, most responsible, and most cost effective solution offered in the draft scope is the “Sitewide Removal Option,” which will ensure that all radioactive, hazardous, and mixed waste is removed from site facilities, soil, sediment, and groundwater throughout the site. The other alternatives (close-in-place, no action, and hybrid) are unacceptable, as they fail to protect our Great Lakes, public health, and future generations. The SEIS must focus on “how” to clean up all the waste, not “if”.***

It is not possible to secure nuclear waste at West Valley in unlined surface burial grounds, when the site cannot meet current siting standards for even low level radioactive waste. Nuclear waste also should not lie on top of a sole source aquifer. It must be excavated, containerized, secured, and monitored until it can be transferred to permanent disposal sites, as the West Valley Demonstration Project Act requires.

As the U.S. Department of Energy (DOE) and New York State Energy and Research Development Authority (NYSERDA) prepare the Supplemental Environmental Impact Statement (SEIS), our organizations collectively urge you to ensure transparency for the public by providing full access to all of the information, codes, models, and assumptions in a publicly-available, searchable, electronic library. We urge you to include the following in the scope of the SEIS:

The SEIS Must Consider Impacts to the Great Lakes Ecosystem

The Great Lakes contain 20% of the world’s fresh water, over 90% of the U.S. supply, and provide drinking water to over 40 million people. The Great Lakes generate more than \$50 billion in economic activity to the regional economy annually from fishing, wildlife viewing, and tourism.

The West Valley nuclear waste site is located in the Town of Ashford, about 30 miles south and upstream of Buffalo, NY. The site sits in the Great Lakes watershed, with tributaries running through and adjacent to the site. Currently, there is a large plume of contaminated, radioactive

groundwater moving off-site into Buttermilk Creek, which flows into Cattaraugus Creek through Zoar Valley and the Seneca Nation into Lake Erie. A major loss of containment of nuclear waste would be a catastrophic failure, leaking high concentrations of radioactive waste into the watershed and then quickly into Lake Erie. What goes into Lake Erie will ultimately travel down the Niagara River and into Lake Ontario, potentially impacting drinking water for the four million New York residents that depend upon the Great Lakes for drinking water. The Great Lakes are also unique in that long lasting pollutants are circulated continuously between the atmosphere and the vast watershed. This magnifies the hazard of allowing any amount of long lived radionuclides to contaminate the Great Lakes.

The SEIS should study the adverse impacts of potential radioactive releases into the Great Lakes, expanding the study to include Lake Erie, the Niagara River, Lake Ontario, and St. Lawrence River (using a zero discount rate, so as to reflect damage in the future for such events). The SEIS must consider impacts to drinking water for millions of people, a multi-billion dollar fishing, recreation, and tourism industry, millions of jobs that are dependent upon the Great Lakes, wildlife, and economic development along our waterfronts. The SEIS should also consider that a radioactive release threatens recent investments in the Great Lakes and progress to restore the lakes—the federal Great Lakes Restoration Initiative (GLRI) has invested \$198 million in 338 projects in New York State alone since 2010, including successful projects to clean up toxic hot spots, reduce polluted runoff, restore critical habitat, and more.

The SEIS Must Consider the Impacts of Climate Change

There is clear scientific evidence that climate change is resulting in an increase in extreme weather events. In the past year the nation has experienced multiple rain events that exceeded 20 inches in 24 hours. The Northeast region has experienced more than a 70% increase in extreme rainfall events—those in the top 1% for amount of rainfall in 24 hours—since 1958. Extreme rainfall events can cause far more erosion than increases in annual rainfall.

Erosion is a powerful and fast moving force at the West Valley site, as it sits on a geologically young and continuously changing landscape. An extreme weather event in West Valley in August of 2009 demonstrated how quickly the landscape can be altered. In this event, rapidly moving floodwaters scoured the toe of the Buttermilk valley wall, resulting in a large landslide that moved the valley wall 15 feet closer to the State burial grounds. Increased extreme weather events associated with climate change increase the likelihood of erosion, mass wasting and landslides, as well as the potential release of radioactive waste from West Valley into the Great Lakes.

Regrettably, the scoping notice failed to mention climate change as a potential environmental issue for analysis or as having potentially severe adverse impacts. A performance assessment of West Valley's nuclear waste facilities must address worst case scenarios that address the site's unique vulnerabilities and potential impacts from extreme weather caused by worsening climate change. Scenarios that cause the loss of containment and the potential for release of radioactive waste into the surrounding environment should be studied. The modelling performed must be capable of capturing multiple extreme weather events rather than just long term averages.

The SEIS Must Consider Impacts on Public Health for Thousands of Generations

Much of the site is heavily contaminated with dangerous radioactive wastes, many of which will be radioactive for tens of thousands of years, and some for millions of years. There is no safe level of exposure to radioactive waste¹— every exposure increases the risk of serious adverse health impacts, including cancer, birth defects, neurological effects, and other health damage. Leaving any waste buried onsite, risking a release of dangerous radioactive waste into the surrounding environment and our Great Lakes, threatens public health for thousands of generations to come.

The SEIS Must Consider the Long-Term Cost Benefits of Full Cleanup

The Sitewide Removal Option provides the most cost-effective approach over the long term. An independent, state-funded study released in 2008—*The Real Costs of Cleaning Up Nuclear Waste: A Full Cost Accounting of Cleanup Options for the West Valley Nuclear Waste Site*—revealed that leaving buried waste at the site is both high risk and expensive, while a waste excavation cleanup presents the least risk to a large population at the lowest cost. Full site cleanup was estimated to cost \$9.9 billion (in 1996 dollars) while future costs of remediation of onsite buried waste costs would cost \$13 billion, and \$27 billion if a catastrophic release of only a small portion of the radioactive waste occurred. While a full exhumation of waste appears costly, the costs associated with a catastrophic release over the long term would be significantly higher. The SEIS must report and assess using a ZERO discount rate. It is essential to *not* discount future costs as this would skew and minimize the significance of future releases and consequences.

In closing, we strongly support the Sitewide Removal Option to clean up the West Valley site as soon as possible. We can no longer kick the can down the road, passing along this burden to future generations. To do so is irresponsible, dangerous, and costly.

The SEIS must focus on *how* to clean up all the waste, not *if*.

Thank you for your consideration of our comments.

Sincerely,

Jessica Azulay
Project Director
Alliance for a Green Economy

Nate Drag
Water Project Manager
Alliance for the Great Lakes

¹ Health Risks from Exposure to Low Levels of Ionizing Radiation: BEIR VII Phase 2 2006.

Kevin Kamps
Radioactive Waste Specialist
Beyond Nuclear

Ziggy Kleinau
Co-Founder and Outreach Director
Bruce Peninsula Environment Group

Sister Sharon Goodremote, FSSJ
Buffalo Diocese Care for Creation Committee

Brian Eden
Vice-Chair
Campaign for Renewable Energy

Theresa McClenaghan
Executive Director
Canadian Environmental Law Association

Kathleen A. Curtis, LPN
Executive Director
Clean and Healthy New York

Bob Cohen
Policy Director
Citizen Action of New York

Brian Smith
Associate Executive Director
Citizens Campaign for the Environment

Barbara Warren
Executive Director
Citizens' Environmental Coalition

Victor McManemy
Chairperson
Citizens for Alternatives to Chemical Contamination

Jessie Collins
Co-chair
Citizens' Resistance at Fermi 2 (CRAFT)

Rebecca Newberry
Executive Director
Clean Air
Ann Tiffany
CNY Solidarity

Joanne Hameister
Facilitator
Coalition on West Valley Nuclear Wastes

Tom Ellis
Board Member
Community Concerned About NL Industries

Nick O'Keefe
President
Concerned Citizens of Cattaraugus County

Stephen Brittle
President
Don't Waste Arizona

Marie McRae
Spokesperson
Dryden Resource Awareness Coalition

David O'Donnell
Owner
Eastern Monarch Butterfly Farm

Judy Braiman
Empire State Consumer Project

Elizabeth Moran
Water and Natural Resources Director
Environmental Advocates of New York

Charley Bowman
Co-Chair
Environmental Justice Task Force of the WNY Peace Center

Wenonah Hauter
Executive Director
Food & Water Watch

Anne Petermann
Executive Director
Global Justice Ecology Project

Susan Hito Shapiro
Goshen Green Farms, LLC

Paula Gotsch
Grandmothers, Mothers and More for Energy Safety (GRAMMES)

Heather Helman
Community Garden Manager
Grassroots Gardens WNY

Laura Weinberg
President
Great Neck Breast Cancer Coalition

Mark Dunlea
Chairperson
Green Education and Legal Fund

Diane Brandli, ASID, CID, LEED AP
President
GreeningUSA

Diane Clark
Executive Director
Greystone Nature Preserve

Fr. William J. Weiksna, OFM
Chair
Holy Name Province Directorate for Justice, Peace and the Integrity of Creation

Anne Rabe
Coordinator
Hoosick Falls Support Network

Manna Jo Greene
Environmental Director
Hudson River Sloop Clearwater, Inc.

Sister Eileen O'Connor
Co-chair
Interfaith Climate Justice Community

Dr. Timothy Miller
Director
Lockport Wellness

Lisa Tyson
Director
Long Island Progressive Coalition

Diane Picard
Executive Director
Massachusetts Avenue Project

Vic Macks
Steering Committee
Michigan Stop the Nuclear Bombs Campaign

Hilary Baum
Program Director
New York Sustainable Business Council

Amy H. Witryol
Co-Chair
Niagara Health Science Report

Lynn Rehfeld-Kenney
Conservation Chair
Niagara Frontier Chapter of the Adirondack Mountain Club

Alexandra McPherson
Principle
Niagara Share

Vincent Agnello
Executive Secretary
Niagara Watershed Alliance

William Townsend and Patricia Townsend
Co-Chairs
North Presbyterian Church, Earth Care group

Alice Slater
Nuclear Age Peace Foundation

David A. Kraft
Director
Nuclear Energy Information Service

Diane Swords
Nuclear Free World Committee of Syracuse Peace Council

Diane D'Arrigo
Radioactive Waste Project Director
Nuclear Information and Resource Service

Scott Kovac
Research and Operations Director
Nuclear Watch New Mexico

Russ Haven
General Counsel
NYPIRG

Ron Urban
Chairman
NY Trout Unlimited

Sheila Parks, Ed.D.
Founder
On Behalf of Planet Earth

Angela Bischoff
Director
Ontario Clean Air Alliance

Jim Anderson
President
Peace Action New York State

Jenny Lisak
Co-director
Pennsylvania Alliance for Clean Water and Air
,

Faye More
Chair
Port Hope Community Health Concerns Committee

Vina Colley
President
Portsmouth-Piketon Residents for Environmental Safety and Security (PRESS)

Laura Norris-Buisch
Stated Clerk
Presbytery of Western New York

Michel Lee, Esq.
Senior Analyst
Promoting Health and Sustainable Energy (PHASE)

Timothy Henderson
Vice-President
Residents for Responsible Government (RRG)

Roger Cook
Co-chair, Church Board
Riverside-Salem United Church, Church of Christ-Disciples of Christ

Judith Mohling
Coordinator, Nuclear Nexus
Rocky Mountain Peace and Justice Center

Lee Willbanks
Riverkeeper, Executive Director
Save The River / Upper St. Lawrence Riverkeeper

Wayne Howard & Lino Grima
Co-Chairs
Sierra Binational Great Lakes Committee

Roger Downs
Conservation Director
Sierra Club Atlantic Chapter

Adam Flint
Program Manager, Southern Tier Solar works (STSW)
Binghamton Regional Sustainability Coalition

Maureen K. Headington
President Stand Up/Save Lives Campaign

Linda Reik
Board of Directors Member
Sullivan Alliance for Sustainable Development

Larysa Dyrszka MD
Co-founder
Sullivan Area Citizens for Responsible Energy Development (SACRED)

Michaela Czerkies
Staff Organizer
Syracuse Peace Council

Jerry Stein
Convenor
The Peace Farm

Marylia Kelley
Executive Director
Tri-Valley CAREs (Communities Against a Radioactive Environment)

Ronald Balicki
Vice President
Trout Unlimited Red House Brook Chapter

Lorna C. Hill
Artistic Director
Ujima Company, Inc.

Kelly Travers-Main
Board Chairperson
United Neighbors Concerned About GE Dewey Loeffel Landfill

Antonina Simeti
Executive Director
Western New York Environmental Alliance

Charley Bowman
Co-Chair
Western NY Drilling Defense

Victoria Ross
Executive Director
Western NY Peace Center, Inc.

Laura Dewey
Coordinator
Women's International League for Peace & Freedom--Detroit Branch