



Los Alamos Study Group

Nuclear Disarmament • Environmental Protection • Social Justice • Economic Sustainability

Some Overall Remarks on “Transforming the U.S. Strategic Posture and Weapons Complex for Transition to a Nuclear Weapons Free World”

A report by the “Nuclear Weapons Complex Consolidation Network”¹

Greg Mello, 6/1/09

1. Nuclear weapons complex consolidation: poor policy, poor structure, poor process

It is humbling to discover that one is professionally wrong, doubly so when one was just *sure* one was on the right path.

For example, this author once thought it advisable to diversify the missions of the nuclear weapons labs into non-weapons fields, given at least some prior relevant work at the labs and a compelling case for the proposed work *somewhere*. I worked on this “conversion” challenge – a goal usually downgraded today to something more partial, “diversification” – for several years, despite many clues I was mistaken. I listened to those who said what I was doing impossible, but I didn’t fully understand their arguments. I thought I did, of course. So I certainly know what it means to be professionally wrong.

Also, none of us have all the answers. So if we want to act at all (as opposed to being acted upon) we just have to make the best choices we can and act anyway, with our always-imperfect, ever-evolving information and insight. Waffling seldom does any good. Despite our best efforts we may err in important, even dangerous, ways.

In a tiny and highly-centralized field like arms control and disarmament, which in addition these general factors is also subject to a variety of directional influences from peers, agenda-setting funders, prestigious “government-in-waiting” think-tanks, and the careerism that comes with much of this territory, the danger of “group-think” is also intense. Most people are swept along, most of the time.

Everybody working in the public policy arena faces these general problems. This situation begs from all of us a certain tolerance, considerable humility, and a lot of mutual respect, which is perhaps our scarcest resource.

Judgment is, however, also required, however inconvenient it may sometimes be. In the case of the nuclear warhead infrastructure plan produced by the “Nuclear Weapons Complex Consolidation Policy Network (NWCCN, or “network” hereafter),” it is terribly inconvenient.

There is much to praise in this report. There is also much to condemn – including the title purpose of the NWCCN and the nameplate conclusion of its report, which constitute its novelty, primary news value, and chief *raison d’etre*. We believe this purpose and conclusion are wrong and dangerous. It is the purpose of these comments to explain why.

¹ See http://docs.nrdc.org/nuclear/files/nuc_09040701a.pdf.

They are wrong and dangerous for three principle reasons.

First, *the report's principle policy assumption – that geographic consolidation of nuclear warhead sites is a practical, desirable, and just attendant of stockpile reduction and programmatic reform – is a badly flawed idea.* It is flawed fiscally, managerially, and politically. There was no significant analysis in the report supporting it.

Second, *the centralized process by which funds were obtained and used to drive this agenda is a manifestation of serious structural and narrative problems in the “non-profit industrial complex,” not just in this policy area but in others as well.* Such problems are legion and go far beyond the scope of these remarks. One key observation, however, is that the damage from these pervasive problems is magnified in relatively peripheral regions like ours, which experience wide income disparity, external ownership and control of nearly all economic functions, and weak (often corrupt) civil and political institutions. All political activity in such regions, including that in the nonprofit sector in New Mexico, must come to terms with these conditions. Quite often, organizations with what may seem to be a primarily regional and “grassroots” character may have agenda-setting loyalties “upwards” and elsewhere in the nonprofit-foundation “food chain,” similar to the classic colonial *comprador*² role. Others, like the Natural Resource Defense Council’s (NRDC’s) New Mexico operations, barely make a pretense of public engagement if at all, preferring to influence public policy privately from a national base. Against such a backdrop the subject report and the processes which produced it may seem perfectly normal to its authors, just “business as usual.”

Third, *this flawed idea and the flawed structure used to promote it required a flawed process to carry it out, one that involved carefully shielding the foregone conclusions of the study from any democratic discussion in the targeted communities and keeping the entire effort effectively secret in those same communities.*

There is not much support in government for geographic consolidation of the warhead complex, for which we are thankful.³ *Yet even though this consolidation plan appears “dead on arrival,” here is a danger that “weapons complex consolidation” could become unconsciously or semiconsciously linked with “nuclear disarmament” in the minds of well-intentioned people inside and outside government who have no time to critically think about the issues.* Certainly by far the majority of active citizens, even the overworked leaders of relevant organizations, learn facts about nuclear weapons policy issues only at third or fourth hand and don’t always “read the fine print.”

We strongly believe geographic consolidation would advance the interests of the nuclear weapons complex in the long run, if that consolidation could be successfully managed at some future time. It cannot be managed at any time in the next decade, at a minimum, we believe. Consolidation would cost billions of dollars over and above maintaining a conservative stewardship (“curatorship”) capability at the current sites.

We have been reluctant to publish just why consolidation could eventually help the weapons complex thrive, provided the present huge financial and management hurdles could be overcome and local anti-nuclear opposition co-opted or silenced. This report, the litigation and other

² “A native of a colonized country who acts as the agent of the colonizer,” <http://en.wiktionary.org/wiki/comprador>.

³ There may be modest support for some elements of these consolidation proposals in the Republican side of the Senate Energy and Water Appropriations Subcommittee, which is still in some ways loyal to Senator Domenici, recently retired.

strategies which are being pursued along with it, and these organizations, are just the methods, and just folks, who could unwittingly accomplish this untoward, indeed terrible, outcome.

I know the authors don't *want* this, and *say* they don't want it, but what the authors say they want, and what their policies if implemented would actually bring about, are two very different things. They just haven't thought through the implications of this particular "strategic narrative" well.

In two of the public meetings we have held on this report thus far, one of the authors used to the word "hope" in this connection, as in "I hope" nuclear stockpiles drop to 500 very soon. This plus other "hopes" results in the fantastic notion that moving the functions of the Kansas City Plant (KCP) to Albuquerque would not require construction of any actual new factory for nuclear weapons parts, to address just one problematic issue in this report. Well, "if wishes were horses then beggars would ride." There is no analysis of this particular question, or of any of the other similar hard questions, in the report. We use aspirational narratives ("hope") to inspire ourselves and others, but they are dangerous because we can deceive ourselves with them, and whether we know it or not at the time we can deceive others too.

I am using the phrase "strategic narrative" carefully, because it has become difficult to discern strategy and propaganda in this field, as it is difficult to distinguish them in this report. Nuclear weapons proponents nearly always speak in what amounts to a special propaganda dialect, using terms like "nuclear threat," "deterrence," etc. less to convey any precise cognitive meaning and more to evoke a standard political response, signal solidarity with elite audiences, keep inconvenient realities from intruding, and so on.⁴ Robert Lifton is said to call such slogans "thought-terminating clichés." It is perhaps inevitable that phrases like "nuclear abolition" and "a nuclear weapons free world" also run a serious risk of being "thought-terminating clichés." And like the David Duchovny character in the "X Files," many people just "want to believe."

Readers of this report should not confuse what amount to throwaway aspirational statements with the actual short-term policy initiatives being litigated and lobbied by these same organizations. I don't think anybody – especially anybody in the U.S. government – believes there is any likelihood of such aspirations being realized in a time frame relevant to the consolidation decisions which need to be made during this Administration – some, in this fiscal year.

At the same time as these aspirational statements are being showcased, NRDC and other network members are trying to force KCP to move to New Mexico via litigation in Washington, DC District Court and concomitant activities in Kansas City and Washington. These activities – supported by the same main foundation grants; see note 11 – are potentially far more potent than aspirational statements about a "nuclear weapons free world." These funders and organizations have invested what must be at least a hundred thousand dollars if not more in this specific geographic consolidation aspect of this effort. It is therefore difficult to see the "nuclear weapons free world" gloss in the report as much more than a sugar coating for a rather broader – and in this case and others rather more puissant – set of activities and recommendations.

As discussed further below, this proposal would require several billion dollars in new facility investment, which the far simpler plan of downsizing in place need not. That big extra investment, triggered by decisions this report typically places some years in the future, implies a long term

⁴ A recent example of this is the report of the Congressional Commission on the Strategic Posture of the United States ("Perry Commission"), at http://www.usip.org/strategic_posture/index.html. In the author's opinion it is mostly built from "thought-terminating clichés." *Natura abhorret a vacua* -- such a high conceptual vacuum is unlikely to be stable.

commitment to nuclear weapons. In practical effect, and setting aside its abolition gloss, this is not really a disarmament proposal at all but rather a plan for renewing and concentrating the warhead complex.

Hitching something practical and desirable – say, continued, practical nuclear disarmament pursuant to a two-party international agreement or pursued in tit-for-tat unilateral steps against a background framework of transparency – to the highly *impractical* policy of geographic consolidation of NNSA sites would be a good way to slow down disarmament and confuse many people. Nuclear disarmament is smart and practical; geographic consolidation is neither smart nor practical. They should not be linked.

Pretending geographic consolidation is a step toward, or an expeditious concomitant of, nuclear disarmament is just the latest complication attached to nuclear disarmament. It's the kind of thing that could help assure that nuclear abolition doesn't occur "in my lifetime," to use a phrase from President Obama's recent Prague speech.⁵

⁵ Geographic consolidation would require large new facilities at the New Mexico nuclear labs, despite what the report says. It would also strongly support future nuclear weapons funding at those labs. In doing so, consolidation at the New Mexico labs has the same result as two other common strategies, both also (and also mistakenly in the author's view) associated with "nuclear disarmament."

The first of these is prompt ratification of the Comprehensive Test Ban Treaty (CTBT). A problematic goal at best, this is currently a main preoccupation of the arms control community, where it is described to many audiences as an essential or important step toward nuclear disarmament. Any linkage of "nuclear disarmament" with the CTBT in the Senate – the forum which decides – would be disastrous to ratification, however, as almost one-fourth of Republican senators must vote for ratification to assure passage. Republicans have now settled into a pattern of trenchant opposition in general, even to necessary bills; the minority leader recently said he opposes CTBT ratification in particular. For many reasons, ratification during the first Obama Administration, if possible at all, would require commitments to an as-yet unknown set of "safeguards," the purpose of which would be to guarantee confidence in nuclear weapons and their institutions as far into the future as possible. For further discussion of CTBT ratification dangers and difficulties, see Greg Mello, "Obama and CTBT Ratification: Dangerous Distraction," May 5, 2009, at http://www.lasg.org/articles/CTBT_Mello_May2009.htm.)

The perceived political requirements of CTBT ratification have played a significant role in arms control lobbying strategies with respect to the nuclear labs for the past 15 years, generally impeding activist efforts to cut budgets, projects, and programs, with only a few exceptions. It's about 15 years too late to pass a "clean" CTBT.

A third misguided strategy in the author's view is that of attempting to find "new missions" for the weapons laboratories (i.e. finding new missions for the corporations running the labs) as a concomitant or prelude to nuclear disarmament. Aside from the unseemly process of "antinuclear" nonprofits working to secure new business for giant government contractors like Bechtel and Lockheed Martin – don't we have better things to do? – this strategy has many other dangers and impracticalities. For a brief discussion see Greg Mello, "Weapons Labs and the Future of New Mexico: Problems, Prospects, Messages," May 15, 2007, at http://www.lasg.org/NM_labs_future.pdf.

(The goals of consolidating warhead activities at the (New Mexico) labs and converting the (California) lab(s) are not fully contradictory, if clarified geographically in the manner indicated. LANL, with its active, unregulated nuclear waste disposal site, its remote location near relatively poor people and tractable Indian pueblos, in a relatively compliant society with relatively low environmental expectations and relatively friendly regulators, could then become a nuclear *maquiladora*. LLNL could become a relatively clean, weapons-free laboratory at whatever scale and nature that can be sold to the Administration, Congress, and any other funders.)

Coincidentally, all three strategies have two things in common: a) each promotes the budgets, prestige, and employment of the nuclear laboratories; and b) each is said to be necessary prior to or along with nuclear disarmament. Since all three strategies are in our judgment impractical in various ways and to differing degrees, all three are impediments to disarmament. Better disarmament-delaying tactics applicable within the ambit of issues could hardly be devised.

Once the large grant commitments for geographic consolidation were made that set this project in motion, the die was largely set. If injustice is inherent in a goal, as it is here in the goal of geographic consolidation, democratic processes become anathema to achieving it.

Parts of the report are praiseworthy, to be sure. Conservative stockpile maintenance (“curatorship”) was a good alternative to stockpile “stewardship” in 1994 when Jonathan Katz, a member of the JASON defense advisory group, first proposed the idea. His original essay still reads well.⁶ After Katz, this author developed the “curatorship” theme for Tri-Valley CAREs in the mid-1990s in a number of short articles and reports.⁷ So did many others, in many other venues.⁸

In late 2008 the National Nuclear Security Administration (NNSA) concluded its “Complex Transformation Supplemental Programmatic Environmental Impact Statement” (CTSPEIS), backed

A different approach to these questions can be found in many places, including many of the activities of the authoring groups. In Mello, “The Way is the Goal: Disarmament Now!”, Feb 19, 2006, at <http://www.lasg.org/TheWay.htm>, a thesis is developed with three central ideas (as I recall): a) disinvestment is actually disarmament, b) disinvestment is already happening for strong reasons substantially independent of our current efforts, and c) we should support this process and all its actors as best we can. (The essay badly needs editing and updating.)

The use of “antinuclear” narratives to avoid or forestall nuclear disarmament while ignoring the entire imperial context for nuclear weapons is the subject of the important essay “Anti-Nuclear Nuclearism” by Darwin BondGraham and Will Parrish, *Foreign Policy in Focus*, Jan 12, 2009, at <http://www.fpif.org/fpiftxt/5782>. Promotion of nuclear “consolidation” fits well into this “antinuclear-nuclearism” pattern, though some other elements in this report and in the work of the authoring groups do not, thankfully.

⁶ Jonathan Katz, “Curatorship vs. Stewardship,” at <http://wuphys.wustl.edu/~katz/curator.html>.

⁷ Three are archived at <http://www.lasg.org/archive/archive95.htm>. Curatorship has long been defined in precise policy terms; see for example “Proposed U.S. Policy Regarding New Nuclear Weapons,” October 1996, at <http://www.lasg.org/archive/1996/proposednukes.htm>:

All activities in the stockpile stewardship and management program shall be conducted to assure the continuing reliability of existing weapons and weapon types, and for no other purpose. Careful study has shown that the overall safety of the current arsenal is adequate from the design perspective; attempts to improve safety by design changes are likely to reduce overall nuclear safety. Overall safety shall continue to be enhanced by military operational changes.

The U.S. will retain and deploy only those stockpile weapons which have been fully tested in their actual military stockpile configuration. Attempted “improvements” to the physics packages for the sake of increased robustness or safety, or for any other purpose, may eventually degrade confidence. Inadequately tested designs have been the principle cause of historic problems in the stockpile and are to be scrupulously avoided. This would preclude repackaging nuclear explosives into new warhead or bomb configurations, the development of new, but untested, designs, as well as the modification of existing physics packages for any purpose whatsoever. In sum, there shall be no design changes to the nuclear components -- the “physics packages” -- of weapons in the U.S. stockpile. Components which degrade with age shall be replaced from component stocks or with newly manufactured replacement components of original specification.

Neither shall there be any changes whatsoever to the military characteristics of weapons, except as regards those safety and security characteristics which can be implemented, after complete testing, without modification of the physics packages and without changing current missions, delivery systems, or in any other way enhancing military utility.

⁸ It is odd that the extensive history of the curatorship notion as well as its specific authorship is not referenced anywhere in the report. Readers of this report who are new to the subject would get the idea that the authors of the report came up with the idea themselves. Presumably this is an exercise in corporate “branding,” an example of how salesmanship has affected nonprofit practice.

up by doubly redundant business case studies.⁹ In that process, NNSA did an exemplary job of public involvement, putting this NGO “consolidation network,” which was working at the same time, to shame. This “network’s” purposes and methods did *not* include gathering ideas and public comment. *Its purpose was rather to provide a façade of regional support for consolidation activities, perhaps in part to compensate for the expected outcry from targeted communities.* NNSA works to a much higher standard of straightforwardness and due process than this network. They have to. They can be sued.

The plan was made public on April 8, 2009. We hope its authors and their foundation funders will now reconsider their proposed policy of consolidation, the faulty structure created to drive it, and the unfortunate process that allowed those ideas to develop for so long in the dark without improvement, correction, or accountability.

The wasted foundation resources that conjured up this “network” and its report could have been spent far more wisely had foundation staff performed elementary due diligence. A few phone calls would have done the trick.

2. Who’s behind this? The report’s authors, foundation funders, and network members

The report’s authors are:

- Bob Civiak, a former Office of Management and Budget (OMB) analyst (lead author);
- Chris Paine, Natural Resources Defense Council (NRDC);
- Peter Stockton and Ingrid Drake, Project on Government Oversight (POGO);¹⁰
- Jay Coghlan, Nuclear Watch New Mexico (NWNM), a project of the Southwest Research and Information Center (SRIC); and
- Marylia Kelley, Tri-Valley CAREs (TVC).

The foundation funders thanked in the report are the:

- Connect U.S. Fund (two grants; Eric Schwartz and Heather Hamilton are the named staff thanked, along with independent evaluators David-Devlin Foltz and Joshua Weissburg of the Aspen Institute); the Connect U.S. Fund is a joint project of the William and Flora Hewlett Foundation, the Open Society Institute, the Ford Foundation, the Rockefeller Brothers Fund, the Atlantic Philanthropies and the Charles Stewart Mott Foundation. Connect U.S. is not in itself a registered foundation and makes no reports to the Internal Revenue Service;¹¹

⁹ See <http://www.complexttransformationspeis.com/>.

¹⁰ Peter Stockton, the lead author listed, has told this author that POGO “went to a couple of meetings but wasn’t a member of any ‘network’ as far as he knew.”

¹¹ At http://www.connectusfund.org/files/2007-08_GSCI_Grantees.pdf we find:

The NRDC Nuclear Program (Collaboration): Consolidating the U.S. Nuclear Weapons Research and Production Complex

The Connect U.S. Fund will support a major collaborative effort to reinforce the political demand at the local, national and international levels for increased control and reduction of nuclear arsenals by pressing the environmental, budgetary and security cases for major consolidation of the US nuclear weapons complex.” The members of the collaborative include the NRDC, the Project on Government

- Tides Foundation (the fiscal sponsor of the Connect U.S. Fund);
- Ploughshares Fund;
- Colombe Foundation;
- David and Katherine Moore Foundation;
- Prospect Hill Foundation;
- Telemachus Foundation;
- New-Land Foundation;
- Samuel Rubin Foundation;
- Town Creek Foundation;
- New Mexico Community Foundation; and the
- Rachael and James Dougherty Foundation.

The members of the NWCCN include:

- NRDC, the lead organization listed in the two Connect U.S. Fund grants;
- NWNM, a project of SRIC;
- TVC;
- POGO¹²;
- “JustPeace of Texas, Amarillo, TX;”
- Physicians for Social Responsibility, Greater Kansas City Chapter (PSR-KC).

The members of this network merit a closer look.

Oversight, Nuclear Watch New Mexico, Tri-Valley CAREs of Livermore, California, Peace Farm of Texas, and PeaceWorks of Kansas City.

The next grant is http://www.connectusfund.org/files/GSCI_Grant_Descriptions_2008-2009.pdf: NRDC Nuclear Weapons Program (on behalf of Nuclear Weapons Complex Consolidation Network) (collaboration): Nuclear Weapons Complex Consolidation (NWCC) Network: \$85,000

The National Resources Defense Council will continue to reinforce the political demand at the local, national and international levels for increased control and reduction of nuclear arsenals by pressing the environmental, budgetary, security and geopolitical case for major consolidation of the U.S. nuclear weapons complex. They will use litigation and the environmental impact statement process to advance a wider understanding of the benefits of reaching dramatically lower levels of nuclear weapons. The members of the collaborative include the NRDC, the Project on Government Oversight, Nuclear Watch New Mexico, Tri-Valley CAREs of Livermore, California, Peace Farm of Texas, and the Kansas City chapter of Physicians for Social Responsibility.

The NWCCN member groups in Amarillo and Kansas City changed from the first grant to the second; see text. No other “members” of the “network” are listed.

More information about Connect US is available at http://www.sourcewatch.org/index.php?title=Connect_US_Fund.

¹² POGO was listed in both Connect U.S. Fund grants as a member of the funded collaborative. The final report lists POGO as a network “contributor,” not member. Two POGO staff members are listed as report authors; one (Ingrid Drake) helped present the findings on April 8, 2009. See text.

First consider Amarillo, one corner of the proposed “Southwest Nuclear Triangle.”

JustPeace of Amarillo and PSR-KC are the two network members which are not listed as authors. We do not know if either of these organizations was active prior to the formation and funding of this network. Upon information and belief they were not.

“Just Peace” appears to be a brand-new organization in Amarillo, if it is actually an organization and if it is really in Amarillo. It may be a “one-person show.” Ms. Mavis Belisle, the contact [listed](#), (whom we have known and with whom we have worked for many years), now lives at least part-time in Dallas. “Just Peace” of Amarillo has no web site and there is virtually no web record of any such organization ever having existed or ever having done anything besides this collaboration.¹³

Peace Farm of Amarillo – an original “member” of the NWCCN in 2007 according to the Connect U.S. Fund – has never supported increasing pit storage at Pantex, which this report advocates. Neither has STAND of Amarillo, another nuclear issue organization in Amarillo.¹⁴ Both organizations have been intimately involved in the nexus of issues relating to Pantex pit storage and the potential expansion of Pantex since the early 1990s. A third long-running nuclear-related organization in Amarillo, PANAL (Panhandle Area Neighbors and Landowners), began in 1989 specifically to oppose Pantex expansion. PANAL has also long opposed increasing Pantex pit storage.

None of these groups are members of this network, none were approached by it, and none support its goals. Ms. Belisle’s apparent endorsement of expanded pit storage at Pantex is highly unrepresentative of the actual nuclear issue organizations in the area – including the organization of which Ms. Belisle was the director for many years.

Moving now to Kansas City, by far the largest peace organization in Kansas City is PeaceWorks. PeaceWorks, like the Peace Farm, was listed by the Connect U.S. Fund as a member of the NWCCN in 2007 but not in 2008. PeaceWorks does not support building new nuclear weapons production facilities anywhere – either in Kansas City, in Albuquerque, or anywhere else.¹⁵ To the extent consolidation of Kansas City Plant (KCP) functions at Sandia National Laboratories (SNL) would require the construction of new facilities, PeaceWorks did not (as of October 2008) support that plan.

As we will show later, consolidation of KCP functions to a new city would involve construction comparable to the planned new KCP construction in Kansas City.

We do not know the extent to which moving KCP’s functions to New Mexico is supported by the peace and justice community in Kansas City. Upon information and belief, one or more individuals have been recruited by NWNM and allied organizations for this specific role and paid for their involvement from project funds.

¹³ Informal associations can accomplish a great deal, but for the record as of 4/29/09 there was also no listing of any “Just Peace” organization on the Texas Attorney General’s website (<http://www.oag.state.tx.us/consumer/nonprofits.shtml>) or at GuideStar (<http://www2.guidestar.org>).

¹⁴ Per telephone conversation with Beverly Gattis, STAND president. STAND and the Los Alamos Study Group have overlapping personnel. Ms. Gattis is a Study Group board member; Study Group Operations Director Trish Williams-Mello is a STAND board member.

¹⁵ Interview with Dave Pack, Board Chairman, PeaceWorks, 10/2/08.

Neither do we know whether this plan has been presented to the peace and justice community in Kansas City in a factual manner, as opposed to merely aspirational one (as in, “this is what we hope would happen in New Mexico”), or a prejudiced one (as in, “this is the environmental situation as we need it to be for our lawsuit”). As far as we can tell from this report and court filings, objective analysis of the issues involved in the future of KCP is scarce in this group.

A central conclusion of the many conversations Study Group staff, board, and volunteers have had with numerous individuals in Kansas City (some by telephone and some face-to-face in Kansas City), is that “support” for moving KCP’s functions (and jobs) away from Kansas City and into new facilities in New Mexico is mostly if not entirely a product of a) the extensive efforts of NWNM and b) the funding made available from the above listed sources. Disarmament and environmental cleanup were the pre-existing objectives held by the peace and justice community in Kansas City; consolidation was the means offered to achieve both. As we will show later it would do neither.

What of POGO, then? The lead POGO author of the report, Peter Stockton, told us he was not aware that his organization belonged to any “consolidation network.” Three of us at the Study Group have had numerous, long conversations about the future of the nuclear weapons complex over the past two or three years with both Peter and Ingrid, as well as with POGO Executive Director Danielle Brian. To our best recollection, no one at POGO has ever expressed to us any support for the idea of consolidating the complex as described in this report, though we have freely discussed and debated many other related issues in what we imagined was a spirit of open, mutual inquiry.

What support is there in New Mexico for this plan? This author has been active in New Mexico nuclear politics since the early Reagan Administration and full-time for the past 17 years. The notion of consolidating the nuclear weapons complex as much as possible at Sandia National Laboratories (SNL), Los Alamos National Laboratory (LANL) as expressed by these authors, is definitely *not* representative of progressive citizens in New Mexico and *not* representative of other New Mexico nuclear issue organizations – or at least, up to now.

We have specifically discussed the KCP portion of this plan in several public meetings over the past year. The only person¹⁶ who ever spoke in favor of nuclear consolidation as a policy at *any* of these meetings was Jay Coghlan, whose organization has received large foundation grants to pursue this plan. Local popular reception of the idea of consolidating all U.S. uranium processing and manufacture at LANL, and all tritium storage and handling, is unlikely to be positive.

It’s a good exercise for all of us in the nonprofit community to ask ourselves, “Whom do I serve?” Many of our organizations have a *structural* lack of accountability, which is inherent in any “member-free” nonprofit.¹⁷ The Los Alamos Study Group, like NRDC, Tri-Valley CAREs, NWNM, and many other similar organizations, has no formal voting membership. Recognizing this problem, we at the Los Alamos Study Group usually conduct dozens of public meetings and discussions with our supporters and interested members of the public every year, not just in

¹⁶ Since the original draft of these comments, Janet Greenwald of Citizens for Alternatives to Radioactive Dumping suggested, at a public meeting we organized on May 27, 2009, that it might be appropriate for New Mexicans to accept nuclear consolidation “for the common good.” Upon information and belief, funding for Ms. Greenwald’s organization is highly dependent upon the good will of individuals in this network. See note 18.

¹⁷ Some nonprofits have voting members, a structure which comes with a whole set of *other* problems, including large financial overhead and instability in many forms. It is far from clear that having a voting membership creates more accountability, as the history of many organizations (e.g. the Sierra Club) shows.

Albuquerque but also in Santa Fe, Taos, and elsewhere. These meetings take time and money but they are very important.

Going beyond this common structural problem, however, NWNM is not a nonprofit organization at all. Lacking voting directors with social, business or other ties to a community, NWNM lacks these built-in means of local accountability as well. NWNM does have a fiduciary agent, namely SRIC. NWNM is a SRIC project.¹⁸

Thus were we to ask the question, “Has NWNM’s board & membership been consulted about its promotion of geographic consolidation of nuclear weapons work in New Mexico,” as I have been asked several times, that question would not make sense because NWNM has neither membership nor a board of directors. Neither does JustPeace of “Amarillo” [sic] as we have seen.

Did NWNM hold public meetings anywhere in New Mexico to discuss this consolidation plan at any point, either in the conceptual, pre-commitment stage, or at any later time? We know of none. Did JustPeace do so in Amarillo or anywhere else? We are certain it did not.

We also do not know the extent to which the board and membership of PSR-KC, if either exist, or the extent to which the membership and board of PSR as a whole were involved in endorsing the geographic consolidation of the nuclear weapons complex.

NRDC is by far the most knowledgeable and powerful and the best-funded organization in this network, and has the greatest access to funders.¹⁹ In its correspondence regarding KCP consolidation, NRDC described itself as having a staff of “over 350 scientists, economists, environmental litigators, policy experts, advocates and support personnel representing the environmental interests and views of approximately 1.2 million members [sic] and on-line activists...”²⁰

By comparison POGO, the next largest organization involved (or sort of involved, according to Peter Stockton), has very roughly 16 staff. TVC has approximately 4; NWNM, roughly 3. PSR-

¹⁸ Most New Mexico nuclear issue organizations are institutionally incestuous (and closely connected to Democratic Party interests and donors). Don Hancock, the individual working at SRIC on these issues and a founder of NWNM, is the coordinator of NMSEES, a secretive funding collaborative run from within the New Mexico Community Foundation (which in turn receives significant funding from Los Alamos National Laboratory [LANL]). NMSEES controls or influences much of the foundation funding, work program – and, we may surmise, even the institutional survival of several nuclear groups in New Mexico. See <http://www.lasg.org/ActionAlerts/ActionAlerts2008.htm#AA89>. (There is one erratum in that alert: Ned Farquhar, who “helped” Governor Richardson write his book on energy, told me he took a two-month leave of absence from NRDC to help Governor Richardson write the book. He told me he was a staff member of NRDC immediately before and after that project but not during it.) SRIC also plays, with NRDC and others, a major role in energy and climate policy in the state, also with minimal public involvement. SRIC, its NWNM subsidiary, and Tri-Valley CARES are central actors in the Alliance for Nuclear Accountability (ANA), a Washington DC-based network, which like NMSEES and with some of the same members, which also has functioned as a funding broker.

¹⁹ This consolidation report and one other by NRDC were released in back-to-back events the same morning in the same place with the same moderator. The second report (at <http://www.nrdc.org/media/2009/090407.asp>) was written by authors from NRDC and the Federation of American Scientists (FAS). It calls for a new nuclear targeting doctrine focusing on essential infrastructure nodes. Like the complex consolidation study, this study called for a 500 warhead arsenal, much smaller than today’s but larger than any other country’s, an arsenal which the authors would reserve for “indispensible” uses. Does NRDC support a “nuclear weapons free world?” It is difficult to reconcile the notion of nuclear weapons as “indispensible” (the second report) with support of a “nuclear weapons free world” (the first report).

²⁰ Letter from Christopher Paine, NRDC, to Mr. Carlos Salazar, General Services Administration (GSA), 1/13/08.

KC and Just Peace appear to have one or none. Overall staff size is a poor measure of relative power, to be sure, but by any measure this is not a relationship among equals. NRDC dominates.

What are we to conclude about this network, then? Mainly, that its thin façade of legitimacy is just that. It was bought and paid for. Of the hundreds of organizations which have been known to sign onto nuclear weapons policy statements in the past,²¹ here there were just five and most if not all of these have been *paid* to participate. Two organizations have left the process for one reason or another and had to be replaced by two others, one of which barely exists.

3. Our main concerns about the plan, in conclusory form

- The simplest, quickest, cheapest, most managerially feasible, most flexible and most politically acceptable consolidation plan – and for all these reasons (and more) the *best* plan – involves *downsizing as appropriate within the present sites*.
- Downsizing in place is by far the best plan for *all* stockpile scenarios and *all* stockpile maintenance strategies on the stewardship spectrum. We believe this conclusion would have been obvious if geographical and political consolidation had not been the prior assumed goal of the entire exercise. NNSA’s own plan is one of downsizing within each site, a good plan once the new production facilities the agency proposes are left out.²² The absence of analysis in this report supporting the nameplate “consolidation” idea is shocking. The report is long; the analysis of the nameplate idea is short or absent altogether.
- Whether or not admitted by the authors, consolidation would require construction of large new facilities at the receiver sites costing billions of dollars, which a downsizing-in-place strategy would not. Thus consolidation of weapons complex sites is unrealistic from both the management and cost perspectives. Consolidation would require a substantial increase, not a decrease, in nuclear weapons spending. The report pretends these increases aren’t there or masks them by assumed cutbacks in program spending.
- Cutbacks in program spending, as proposed in the report, *are* a good idea both managerially and politically, and we have repeatedly proposed them. They should be considered on their own

²¹ The “Call for Nuclear Disarmament,” for example, had 118 New Mexico and 102 national and international endorsers, and 326 New Mexico business endorsers. See <http://www.lasg.org/campaigns/CallEndorsers.htm>. It contained a simple triad of policy prescriptions:

- Stop the design and manufacture of all nuclear weapons, including plutonium bomb cores (“pits”) at Los Alamos and elsewhere;
- Dismantle our nuclear arsenal in concert with other nuclear powers pursuant to Article VI of the Nuclear Nonproliferation Treaty; and
- Halt disposal of nuclear waste at Los Alamos.

None of NRDC, NWNM, SRIC, or ANA would join these many other organizations and businesses in endorsing this call.

POGO has never pretended to endorse nuclear disarmament, except to our knowledge in this report.

²² These two new production facilities, the Chemistry and Metallurgy Research and Replacement (CMRR) Nuclear Facility at LANL and the Uranium Processing Facility (UPF) at Y-12, are at present delayed, their futures uncertain.

merits, however, not mashed together with the geographic consolidation of sites, to which they are entirely unrelated. The motive for consolidation in this report is political, not managerial or fiscal. It appears that the sudden, deep, and impractical program cuts proposed in this report are designed to create the appearance of net budget savings. That would not be the reality, should consolidation proceed.

- The construction of new factories would ignite powerful new regional political constituencies for nuclear weapons and fan existing ones in the short run, and perpetuate the nuclear weapons complex in the long run.
- Moving any skilled, specialized nuclear weapons workforce, on average nearing retirement age, along with their most experienced managers, to new locations several hundred or more miles away from their current ones will just not be possible. This is true even if the receiver site is perceived as an attractive place to live, which it is not in the case of Los Alamos, as NNSA has documented. Hiring and training a new workforce in a new factory with only a handful of “old-timers” will be fraught with very great difficulties. It is also dangerous to workers and the public.
- There is a dawning water shortage in New Mexico, a state beginning to experience dramatic climate change. All expert parties agree this will more or less quickly manifest as more or less permanent, and more or less severe, drought. These changes will affect any attempted consolidation plan directly and indirectly through residential attractiveness, the health of the overall economy, school performance, and in many other ways. By 2030, most of New Mexico will be a desert. Its water supply will be inadequate for anything approaching current water uses far before that date.
- There is no analysis in the report supporting the proposed consolidation because consolidation was *assumed*, as the name of the network implies, and was not an objective analytical outcome. What little data was provided was selected and arrayed to support consolidation, the reason for the entire effort and an *a priori* commitment to the main foundation funders. This is also why it was not necessary to seek independent, expert views, or listen to voices (like ours) which publicly (and privately, in the case of NRDC) urged them to abandon this effort.
- The environmental injustice and colonialism issues raised by this consolidation plan, as well as the process by which it has been developed, are appalling. Those who would be impacted were never consulted.
- Concentrating nuclear weapons work in two neighboring states, as proposed here, is highly likely to create the conditions for *impregnable* congressional deference to nuclear weapons activities in these remaining locations. The growing *civilian* nuclear industry in southeastern New Mexico and nearby west Texas would likely exacerbate and intensify political support for “all things nuclear” in a synergistic manner.²³ Geographic consolidation means political concentration, and is a very dangerous strategy. It does not serve disarmament and nonproliferation goals either directly or by lessening future congressional support for nuclear weapons. It is a *substitute* for disarmament and downsizing, not a step toward them. Under

²³ To this concentration must be added chemical waste disposal, a growing industry just over the Texas line from Eunice, NM.

conditions of gradual, partial disarmament – all realistic scenarios, in other words – consolidation could help *modernize* and *protect* the nuclear weapons establishment. Moving nuclear weapons functions to New Mexico means moving them to a state which will protect them at all costs.

- For all these reasons the nameplate “consolidation” plan is no more practical or desirable than it has been at any other time over the past two decades. The supposed budgetary benefits are, to repeat, illusory.
- The politics of place has been a key component in civil society struggles. Most grassroots nuclear activism arises in and through local issues. More broadly, “all politics is local.” *The process that led to this report, if continued, would basically sever the grassroots.* To the extent all democratic politics is local, this strategy is *post-democratic* – a strategy of *rule* and not a *political* strategy *sensu stricta* at all.

The long-term strategic downsides of this report’s political strategy can hardly be overstated. It is primarily in and through local engagement that nuclear issues can be most fruitfully linked to the broader societal issues in which they find their most powerful salience. The primary alternative to local politics is debate in Washington, DC, the imperial capital, where progressive popular forces are generally at their very weakest.

- There are three main unrealistic assumptions underpinning geographic consolidation:
 - The U.S. nuclear stockpile is going to decline to 500 total weapons *soon*, and such a stockpile comprises a realistic basis to plan the nuclear weapons complex *right now*;
 - The workload needed to maintain these warheads and dismantle retired warheads is actually minimal; and
 - There already exist large, appropriate facilities at the receiver sites which can do this downsized, consolidated work.

Taken together, these assumptions directly produce the nameplate conclusion without further ado.

Instead of these three assumptions, the following three contraries are true:

- The stockpile is *not likely to decline to 500 total warheads any time soon*, so such a stockpile is not a good basis for planning right now even if we *wish* it were true;
- Even if a future 500-warhead stockpile were officially foreseen some day (say in the upcoming Nuclear Posture Review, NPR), the hoped-for 500-warhead stockpile could never be a realistic basis for planning now prior to success in the complicated international negotiations that would make it real;
- The mission-ready facilities assumed in this report just do not exist, and even fewer such facilities will be available in future years unless on-site downsizing is postponed in favor of possible future consolidation. A more conservative form of stockpile maintenance (“curatorship”), applied to a much smaller arsenal, would indeed decrease production workloads, but neither facilities nor staff will scale in proportion to these changes. There are thresholds, and at some of the production plants we may be approaching them, below which a given maintenance capability does not exist *at all*. While we differ considerably with NNSA over what some of these thresholds are, there is no question they exist. More

production space of the right kind, and more senior, experienced staff in them, are necessary than are provided for in this plan.

- This report has at least three glaring contradictions:
 - *If the stockpile is assumed to be going to 500 warheads soon, and is headed to zero thereafter as the authors claim, why would it make sense to build new “consolidated” facilities,* which would even in the most optimistic case have a long payback time (or be impractical and uneconomic over *any* time period, as they actually are)? This report has sketched out a plan for the inadequate, *but apparently permanent*, maintenance of a 500-warhead stockpile, despite its frequent invocations of nuclear abolition. This dovetails with the other NRDC report released the same day, which sketched in a new set of “indispensable” missions for that same arbitrary 500-warhead arsenal.

Thus in the name of reducing the weapons complex, this plan would build a new weapons complex.

Assuming the U.S. has a nuclear arsenal, large or small, we believe this NNSA statement is accurate: "Undermining [any of the weapons complex sites] would be...extremely costly to the taxpayer."²⁴ These sites should be gradually downsized, some like LANL and LLNL much faster and farther than the others, with aggressive community transition programs in place to make sure households do not suffer economic insecurity, vital skills are not lost to society, and to make sure these important communities flourish socially and economically.

- In this report, lessening of congressional support is to be achieved by piling up the nuclear weapons complex in as few states as possible. *But if “congressional deference” (as it’s called) is as powerful a factor in nuclear decisions as the report’s authors imply, why would consolidation be politically feasible? In other words, if consolidation is politically possible at all, why is it attractive?*
- *If LANL isn’t producing pits, why would LANL need a new vault for special nuclear material (SNM) as the report advocates on p. 95?* If the idea is to do less stockpile work, why aren’t the current vaults, assuming they were properly maintained and operated, adequate? They have served the plutonium facility since 1978, including many years during the Cold War when LANL had a large plutonium processing mission.²⁵

²⁴ At http://blogs.knoxnews.com/knx/munger/2009/04/nnsa_unique_missions_in_comple.html.

Just to take one example, LANL's Sigma Facility and related facilities cannot absorb the highly-enriched uranium (HEU) work now taking place at Y-12, at any future scale whatsoever. The building is old, small, upon information and belief not seismically qualified, sits between nearby faults, has little or no chemical processing capability, has little or no vault capability, and little or no organic (e.g. FOGBANK) capability. The brand-new \$60 million FOGBANK facility at Y-12 *could* be duplicated at LANL, and a new HEU vault *could* be built just after building a giant new one at Y-12, and a new U chemical processing facility and a new metal-working facility for uranium *could* be built, etc. at LANL, and goodness knows what else, but doing so would cost at least \$2 billion if not much more. There was no analysis in the report to support the claim that uranium secondary work could or should be done at existing LANL facilities.

²⁵ Perhaps an answer to this riddle is that a new SNM vault would facilitate the uranium secondary mission the report advocates moving from the Y-12 site to LANL, a mission which LANL currently has no place to house.

More broadly, while the report claims to oppose *most* of the CMRR NF – except for the vault, which it welcomes – the mission proposed for LANL in this report would *require* something quite like the CMRR NF. More likely, the combined plutonium and uranium missions at LANL would require something closer to the "double CMRR" option in NNSA's Complex Transformation Supplemental Programmatic Environmental Impact Statement: *two* new nuclear facilities and *two* associated new laboratories, four buildings in all – two for plutonium and two for uranium. It is difficult to see how anything less than this would be safe, secure, and workable.

This concludes the first portion of these comments.