

# Los Alamos Study Group

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February 18, 2025

**SWEIS debrief and next steps -- in-person and Zoom meeting this Thursday 2/20/25 at 6:30 pm in Albuquerque (to attend by Zoom you must register in advance)**

[Permalink](#) for this letter. Prior [letters](#) to this New-Mexico-oriented list.

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[Home page](#); [Press releases](#); [Bulletins](#); [Plutonium Pit Production](#)

Our blog: [Remember your Humanity](#), [Twitter](#) (inactive at present)

[Contribute](#), Volunteer: [What You Can Do](#), Contact [Greg or Trish](#).

Our [Ukraine crisis page](#), updated more or less daily with fresh news and analyses. There is a tremendous amount of news regarding U.S.-EU relations and U.S.-Russian negotiations to end the Ukraine war, which have begun. To accomplish this, at least some steps toward a new mutual security architecture -- will be necessary. We have posted some of the best analysis of these rapid developments [here](#).

This is a letter to our New Mexico-oriented activist mailing list, a subset of our whole mailing list. If you missed our most recent emails, here they are:

- Our most recent **Bulletin**, sent to our whole mailing list: [Bulletin 355: Francis Boyle, RIP / New START countdown](#), Feb 3, 2025
- Our most recent **Press Release**, also sent to our whole mailing list: [Citizens decry years-long tardiness, lack of democracy in hearings on future of Los Alamos National Laboratory](#), Feb 10, 2025
- Our most recent **Letter**, sent to this smaller mailing list: [Urgent planning and background sessions this WEDNESDAY EVENING IN SANTA FE and this THURSDAY EVENING IN ALBUQUERQUE pertaining to NNSA hearings Feb. 11-13 about LANL's future. Help spread the word!](#), Feb 2, 2025

**Key "heads-up" in this letter: we will have an in-person and Zoom SWEIS de-brief and "next steps" meeting this Thursday 2/20/25 at 6:30 pm (Mountain Time) at our offices in Albuquerque, 2901 Summit Place NE ([map](#)).**

**If you plan to attend by Zoom, you must register at <https://us02web.zoom.us/meeting/register/qVbN51U7RmqMQi8TNhj-oA>. After registering, you will receive a confirmation email containing information about joining the meeting.**

Dear friends --

The charade of Site-Wide Environmental Impact Statement (SWEIS) hearings is over. We are pleased that not one person spoke in favor of plutonium warhead core ("pit") production at LANL, and nearly everyone spoke against it. Many people, possibly even most, also spoke out against the SWEIS process in one way or another. Almost everyone spoke authentically and eloquently, which is so inspiring and uplifting to us here. Every person provided a unique perspective, such that there was actually very little repetition. Every voice was fresh and real.

All in all, we feel quite good about the public's participation in these hearings. You and we did well.

The National Nuclear Security Administration (NNSA) did not undertake these hearings to hear public comments, however. They did so to check a bureaucratic box so they could continue to do what they want to do with the minimum amount of resistance from "we the people." The hearings were offered as pacifiers, but the public was not and is not pacified. Nonviolent, yes, but not pacified.

Unless we can talk NNSA into posting their videos of the hearings, we will be posting our own and others' videos of citizen testimony and protest. If we do not post what we have, parties which were not present (physically or on-line) will not be able to understand the inspiring character of what went on.

Here are two representative news articles and a short video:

- [Public rails against plutonium pit production during LANL meeting](#), *New Mexico Political Report*, Feb 12, 2025
- [Critics at hearing speak out against expansion plan, pit production at LANL](#), *Santa Fe New Mexican*, Feb 11, 2025
- [New Mexicans say 'No' to a new plutonium bomb factory in Los Alamos](#), short video, *Breakthrough News*, Feb. 15, 2025

The *New Mexican* article was the only mainstream one that mentions the protest organized at the second Santa Fe hearing by the Party for Socialism and Liberation (PSL), which was a high point of the hearings.

Our social media followup from this meeting ([our own](#), [BT News](#)) has already reached almost a hundred thousand people.

Here at the Study Group we will conclude our SWEIS participation at this time by filing some basic written comments regarding the overarching illegitimacy of this process, and perhaps a few other issues. We will not be providing peer review for the Draft SWEIS. You can of course [comment](#) too, although it is generally a waste of time. The comment period is currently slated to close on March 11.

So what's next? That's what we want to discuss with you on Thursday. Tremendous changes are afoot. See the box above for more on the physical and virtual locations of this important meeting.

We will follow up this local letter with a Bulletin discussing more of what we think can be done at this time, to stop the pit factory and also gear up for ending the Ukraine War and nuclear disarmament nationwide.

Sincerely,

Greg Mello, for the Study Group

**NO NEW NUCLEAR ARMS RACE WITH RUSSIA AND CHINA! • CANCEL SENTINEL!  
NO U.S WAR WITH RUSSIA & CHINA! • FUND PEOPLES' NEEDS-NOT PLUTONIUM PITS!**

# POST-SWEIS DEBRIEF

**THURSDAY,  
FEBRUARY 20  
6:30-8:30PM**



📍  
**LOS ALAMOS  
STUDY GROUP  
OFFICE**  
2901 SUMMIT PL NE  
ALBUQUERQUE  
**TO JOIN VIRTUALLY  
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# WHERE DO WE GO FROM HERE?

LOS ALAMOS  STUDY GROUP

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2901 Summit Place NE Albuquerque, NM 87106, Phone: 505-265-1200

# Los Alamos Study Group

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February 2, 2025

**Urgent planning and background sessions this WEDNESDAY EVENING IN SANTA FE and this THURSDAY EVENING IN ALBUQUERQUE pertaining to NNSA hearings Feb. 11-13 about LANL's future. Help spread the word!**

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Our blog: [Remember your Humanity](#). [Twitter](#) (inactive at present)

[Contribute](#). Volunteer: [What You Can Do](#). Contact [Greg](#) or [Trish](#).

Our [Ukraine crisis page](#), updated more or less daily with fresh news and analyses. In brief: "Ukraine" (i.e. Ukraine+NATO, principally the US) is losing people, machines, and territory at an accelerating pace. Ukraine has lost the war and badly needs peace, as more and more people are realizing. This perspective is even trickling into the mainstream media. Read about it on our [Ukraine page](#).

This is a letter to our New Mexico-oriented activist mailing list, a subset of our whole mailing list. If you missed our most recent emails, here they are:

- Our most recent [Bulletin](#), sent to our whole mailing list: Bulletin 354: [Thank you! / Fundraising drive continues / "How New Mexico Ranks"](#) (12/23/24)
- Our most recent [Press Release](#), also sent to our whole mailing list: [In Los Alamos, Scott Ritter and Dmitri Trenin discuss paths to peace in Ukraine; other resources](#) (1/20/25)
- Our most recent [Letter](#), sent to this smaller mailing list: [Crunch time! Please come to the LANL Site-Wide Environmental Impact Statement Hearings Feb. 11-13. Help spread the word! \(Part I\)](#) (01/23/2025)

Dear friends:

It is an important moment in New Mexico nuclear history. **We are being challenged as to whether we will, or will not, oppose a large new nuclear weapons factory in the state and all that will come from it, from more nuclear waste to even more nuclear weapons and related missions. What's at stake is nothing less than the overall direction of the state.**

To discuss our response, we are hosting two urgent community planning and background sessions this week:

- Wednesday 2/5/25 from 6 to 8 pm at St. John's United Methodist Church in Santa Fe (1200 Old Pecos Trail, [map](#))**
- Thursday evening 2/6/25 from 5:30 to 8 pm at the Albuquerque Center for Peace and Justice (202 Harvard Drive SE, [map](#)).**

**We urge everyone interested in nuclear issues, or in the economic and social future of the state, to come to one of these meetings.**

These meetings are preparatory to the upcoming National Nuclear Security Administration (NNSA) hearings regarding the future of the Los Alamos National Laboratory (LANL), to be held the following week at these locations and times:

- Tuesday, February 11, 2025**, 1:00-4:00 pm (Virtual Meeting: 1:30-4:00 pm), Santa Fe Community Convention Center, Sweeney Ballroom, 201 W. Marcy St., Santa Fe, NM 87501 ([map](#))
- Tuesday, February 11, 2025**, 5:00-8:00 pm (Virtual Meeting: 5:30-8:00 pm), Santa Fe Community Convention Center, Sweeney Ballroom
- Wednesday, February 12, 2025**, 5:00-8:00 pm, Mision y Convento, 405 N. Paseo de Onate, Española, NM 87532 ([map](#))
- Thursday, February 13, 2025**, 5:00-8:00 pm, Fuller Lodge, 2312 Central Ave., Los Alamos, NM 87544 ([map](#))

The [Draft Site-Wide Environmental Impact Statement \(SWEIS\) for LANL](#) is ostensibly the vehicle by which the future of LANL will be discussed at these hearings, as we explained in our previous [letter](#). NNSA wants our buy-in to the process, not just the product. If they get the former, they've got the latter too.

We could comment about the SWEIS in detail in this letter -- and there will be time for that -- but that would miss the main point. We'd be falling into a trap. We come to bury the SWEIS, not to praise it.

As we said last time, the SWEIS comes after far too many decisions, and the hearings this month are designed to strip democratic agency from civil society -- from you and me -- not to provide it. NNSA is not there to listen to you. It's providing a sophisticated way to take your voice away from you.

But we can't just stay away. In many other states, people can. Not here. This cancer is being thrust on us, and it will grow further if we don't kill it. We're "all in," whether we want to be or not.

New Mexico is in many ways [a failing state](#). We are told we are dependent on the labs all the time. Just this morning, a [Santa Fe New Mexican editorial](#) began, "[i]t's hardly a secret that New Mexico depends on federal largesse to function, from funding for its national laboratories and military bases to dollars that support social welfare programs or pay for necessary infrastructure repairs and construction."

There you have it. What a lazy point of view, from such an exalted pulpit! [Peggy Pond Church](#) thought differently, as she told me: "Los Alamos lab is the worst thing that

ever happened to this state." Peggy's is the wiser vision. LANL (and its offshoot Sandia National Laboratories) have brought nothing of net value to this state.

I am just coming from a week in Washington, half of which was spent with 670 fellow registrants at the so-called "Nuclear Deterrence Summit," mostly nuclear weapons managers and senior employees of one kind or another. It's not pleasant, but we do learn a lot from such meetings. From conferences like this and several hundred meetings on Capital Hill with congressional and executive staff over the past decade and a half, and from 20 years of lobbying and policy work before that, I can tell you an open secret: the nuclear-military state has by now all but conquered the constitutional institutions of the U.S. government. There is very little congressional oversight going on. The nuclear weapons lobby is in charge.

There are however powerful limits within the system itself -- in its labor supply, in the consciences of the human beings working in it, in its material supply chains, in what the President decides to do (that may in fact differ what the bureaucracies and contractors want) -- and in its degree of public acceptance, which conditions everything.

**While mere opinion doesn't matter in itself, opposition expressed in the public domain DOES matter, especially if it is factual and expresses commonly-held values and widely-felt human needs. The nuclear-military state needs our silent concurrence to maintain its facade of legitimacy and its social acceptance, which are necessary for it to operate. It needs our tacit permission to continue using and abusing New Mexico, as continues to milk the federal government as a whole.**

We're a nuclear "company state" here, as our former board president Zia Mian recently put it.

Now, to help maintain the facade and help the nuclear arms race, all we have to do is to either

1. skip the hearings, or
2. go to these hearings, pretend they are democratic, and register our comments.

**The third option is to make these hearings serve our cause, using them as rallying opportunities against plutonium pit production, LANL expansion, and against the political leadership class that has brought these insults to our communities.** (It was not originally NNSA's idea to make LANL a pit factory -- not without a big new building anyway, which some of us helped bring to an end.)

That is, we need to use the hearings creatively, not just line up like sheep to the slaughter. We need to meet with each other to plan, strategically and tactically. Hundreds of organizations and business and thousands of individuals are with us, but that latent political power only manifests when people come together.

If LANL is allowed as much as they have put into their "No Action Alternative," *which includes a legal requirement to do as much plutonium pit production as is physically possible, as fast as possible*, NNSA will a) add even more nuclear missions and facilities, b) also capture more control over the state's political and economic future. Affordable housing in Santa Fe or anywhere nearby? Forget about it.

#### **More about pit production in particular**

First and foremost, pit production at LANL is not a "done deal," as so many will tell you. There are many arms control and "antinuclear" organizations, and many politicians, who want all U.S. pit production to occur at LANL and worked to make that happen when NNSA did not want it to happen in LANL's old plutonium facility at all.

All of us who endorsed the [Call for Sanity, not Nuclear Production](#) oppose all pit production, first and foremost at LANL.

Many people think pit production is already underway. It is not. At the moment, it's virtually non-existent. LANL has made exactly one (1) pit for the stockpile since 2012 and only 31 stockpile pits across the 76 years since 1949. Between 1945 and 1949, LANL made 50 simple pits before the Atomic Energy Commission complied with the wishes of LANL management and open production plants elsewhere (at first, in Hanford, WA, and then at the Rocky Flats Plant in CO).

It's a mission LANL never wanted and never had, until Heinrich and Udall told them to "go for it" and organized the senatorial muscle to make it happen in and "for" New Mexico, with then-congresscritters Ben Ray Lujan and his cousin Michelle Lujan Grisham playing important supporting roles. Steve Pearce jumped on the porkwagon as well, providing the "bipartisanship" necessary to get a successful House floor vote on making LANL the "plutonium science and production center of excellence for the U.S.", enforced by statutory deadlines (that are now in the rear-view mirror, unmet).

Shortly afterward, the then-new Trump appointee at NNSA, Lisa Gordon-Hagerty, overturned prior staff decisions and split the plutonium baby, giving more or less half the money to each of two states and accelerating pit production via the Los Alamos program to satisfy the neocons.

At present the start date for actual production (as opposed to the first "trophy pit," as LANL called it last week) is uncertain, as is

- o the scale of production to be reached at different dates,
- o the number of production shifts while it is happening,
- o the workforce needed,
- o when production at LANL will end (although we know it will end),
- o what it will cost, and
- o what its day-to-day and cumulative environmental and community impacts will be.

None of this is known because NNSA has not produced even a draft schedule or cost for pit production at LANL. Nor has NNSA published a so-called "baseline" schedule and cost estimate for the construction needed, or for that matter, even a list of construction projects, or even a prospective campus plan. Nothing is known as yet as to what other large plutonium missions LANL may have in the future, or what additional plutonium facilities NNSA may want to build at LANL.

People who think they know these things don't. NNSA itself doesn't know them. Neither does the Government Accountability Office (GAO), or the White House.

The future of LANL's plutonium missions is therefore much less constrained than many people realize. They assume (wrongly) that NNSA must have clear plans for what they are doing, given that the cost of acquiring pit production is going to be at least as great in constant dollars as the entire Manhattan Project (with about half of that sum going to LANL).

NNSA does have plans, but they are somewhat fluid. As for LANL pit production construction, plans are (remarkably) still in an early stage (despite being in progress since 2020). Completion is expected no sooner than 2032. Costs could easily increase 50% over today's estimates by then.

But where will the money come from? It's not as easy as just asking for, and getting, more. The whole budget agreement in Congress would have to be re-jiggered, according to senior congressional budget auditors in a meeting we held with them last week. *NNSA is in denial about what the arms race it is embarking upon will really cost.*

The real kickers are scale, risks, and duration. Will LANL make 5, 10, or 40 pits per year? "We the people" in New Mexico got NNSA to commit to keeping pit production below 20 ppy on four or five prior occasions. In practice it never went above 11 ppy (and it did that for only one year.) That level was enough to maintain knowledge and train new technicians, and still is. It's not great, but it doesn't require two shifts and it doesn't provide enough pits for a new warhead. Pit production at some low, *de minimus* level is not a new mission for LANL. All the science, all the stockpile surveillance, all the pit aging studies, all the heat source plutonium work, and all the surplus plutonium disposition work now underway could still be done. LANL would not need 4,105 staff members in its pit program as it does now, plus hundreds more subcontractors building up the site and facilities. The cost of that small program was minimal. Today's cost is vast, uncapped.

That's the scale problem.

The risks, whatever they are, increase with the number of people involved and throughput of products. PF-4 was [designed](#) to house about 100 workers; by 2020 it was housing a thousand. Most of them are relatively inexperienced. What could go wrong? Plenty, of course.

So if LANL makes pits, for how long will it do so? Again, no one knows. **The highest possible source privately told me this week that the Savannah River Plutonium Processing Facility (SRPPF) can, when complete, "do the full [pit] mission."** That is precisely the plan, as the top Senate committee staff member on this issue told me two years ago. "What," I asked, "is the plan when PF-4 can no longer make pits? Do you have a plan to replace PF-4?" "The replacement," he said, "is Savannah River."

NNSA loosely [estimates](#) the PF-4 end of life to lie in the 2045 range, up from the previous 2039. It really depends on what safety standards are applied. At present, PF-4 does not operate with complete, modern safety standards. Allowances are made, so NNSA can have one operating plutonium processing facility. There is no other one. As PF-4 and its subsystems age, some of these systems will be replaced, but at some point the safety allowances that have to be made will shut down production -- hopefully before, not after, too many accidents. NNSA's goal is to have SRPPF up and running before that decision has to be made.

This begs the question everybody should be asking: **why do pit production in PF-4 at all?** Why not wait for the new, safer, larger facility that can handle the whole mission, and work like hell to re-start arms control with Russia and China in the meantime? Why not save billions of dollars, tons of transuranic waste, dozens of future highway accidents, and so much more by simply waiting a few years? Pits aren't aging fast enough to make LANL pits important as replacements for anything.

So again, why LANL? The answer is all too simple: RussiaRussiaRussia, ChinaChinaChina, and porkporkpork for New Mexico and the whole nuclear warhead complex, which is already starting to feed off the new Livermore warhead for which LANL would supply the pits.

Please come on Wednesday or Thursday, if you can.

Sincerely,

Greg Mello, for the Sudy Group

# Los Alamos Study Group

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January 23, 2025

**Crunch time! Please come to the LANL Site-Wide Environmental Impact Statement Hearings Feb. 11-13. Help spread the word! (Part I)**

[Permalink](#) for this letter (tomorrow). Prior [letters](#) to this New-Mexico-oriented list.

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- Our most recent [Press Release](#), also sent to our whole mailing list: [In Los Alamos, Scott Ritter and Dmitri Trenin discuss paths to peace in Ukraine; other resources \(1/20/25\)](#)
- Our most recent [Letter](#), sent to this smaller mailing list: [Court extends deadline for agreement in federal lawsuit over nuclear pit production \(which seeks to concentrate all pit production in New Mexico while allowing its acceleration\) \(10/26/2024\)](#)

Synopsis of this letter:

- If you live within driving distance of one or more of the upcoming hearings regarding the Draft [Site-Wide Environmental Impact Statement \(SWEIS\) for Los Alamos National Laboratory \(LANL\)](#), we urge you to attend those meeting(s) **IN PERSON**, and get others to do so as well. Virtual attendance is much less valuable. Signs, banners, costumes, are all possible and welcome.
- We urge you to use these [hearings](#) in whatever way you can to publicly proclaim your resistance to producing any plutonium warhead cores ("pits") at LANL, and get your friends, and organizations you know, to do so as well. You can be as creative as you like. Sincerity and commitment count. It is our job to help amplify your voice. Help us help you.
- We must make these hearings serve us -- the public, tribes, and local and state governments -- not the National Nuclear Security Administration (NNSA) or LANL. While we respect those who worked on the draft SWEIS, most of whom are doing the best they can, overall these hearings are not a good-faith exercise on NNSA's or LANL's part. In themselves, these hearings are a simulacrum of democracy, a show, not the real thing. Those who testify or send comments will not be heard by NNSA in any meaningful way; all the decisions have been made or will be made regardless of what is said by any of us. For us, these hearings are blank slates on which we all can write, empty stages where we can speak and enact the truths we see. They are occasions in which we can build solidarity and find fellowship as we pursue a very different agenda from LANL's: a life-affirming agenda for New Mexico and the United States. How would YOU express that? Tell us all, at the hearings!
- We want everyone to endorse the [Call for Sanity, Not Nuclear Production](#). Your endorsement helps build solidarity with the more than 1,000 individuals and 245 businesses and organizations currently on board.
- If you plan to testify using words, please send us your testimony in written form before, or at, or soon after the hearings and we will collect and post these testimonies on-line. We will also film the proceedings and make that footage available on our [YouTube channel](#).
- LANL pit production is far from a "done deal." Many years and billions of dollars of continued plutonium build-up lie ahead, if investment continues. It is a troubled program, with many strikes against it. We urge you to join us in building further opposition. See [What You Can Do](#). Pit production in the U.S. has already been postponed many years by public opposition, especially in New Mexico. New Mexicans have repeatedly stood up bravely and [successfully](#) against new nuclear weapons, by opposing the making of plutonium pits at LANL. Do not give in to counsels of acceptance and passivity. If pit production at LANL is normalized and accepted it could metastasize, despite all its problems. Other hazardous missions might come as well.

Dear friends --

As you probably read ("[Nuclear agency releases draft environmental impact statement for Los Alamos National Laboratory](#)," 1/9/25), the Department of Energy (DOE) and NNSA have released their [draft SWEIS for LANL](#).

We urge you to attend and testify at one or more of the upcoming hearings regarding this draft document.

**LANL Draft SWEIS hearing dates, times (all are in Mountain Time), and locations**

- **Tuesday, February 11, 2025**, 1:00-4:00 pm (Virtual Meeting: 1:30-4:00 pm), Santa Fe Community Convention Center, Sweeney Ballroom, 201 W. Marcy St., Santa Fe, NM 87501 ([map](#))
- **Tuesday, February 11, 2025**, 5:00-8:00 pm (Virtual Meeting: 5:30-8:00 pm), Santa Fe Community Convention Center, Sweeney Ballroom
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- **Thursday, February 13, 2025**, 5:00-8:00 pm, Fuller Lodge, 2312 Central Ave., Los Alamos, NM 87544 ([map](#))

The draft SWEIS is long and detailed. Some of us will read it carefully, but you can get a pretty good idea of what it says from the [Summary](#).

It has three "alternatives," a word we to which we would add quote marks. Quoting from NNSA, these are:

**The No-Action Alternative includes 87 new projects**, totaling almost 1.5 million square feet, that would be implemented between 2024 and 2038. **Also, under No-Action, NNSA would implement 11 projects involving facility upgrades, utilities, and infrastructure** affecting about 216 acres of the LANL site. About 1.6 million square feet of excess or aging facilities would undergo DD&D under the No-Action Alternative. The No-Action Alternative also

includes changes in operations, examples of which include increased plutonium pit production and the remediation of a chromium plume in Mortandad Canyon (which was the subject of a recent environmental assessment).

**The Modernized Operations Alternative includes the scope of the No-Action Alternative plus additional modernization activities, including (1) construction of replacement facilities; (2) upgrades to existing facilities, utilities, and infrastructure; and (3) DD&D projects. Under the Modernized Operations Alternative, NNSA would replace facilities that are approaching their end of life, upgrade facilities to extend their lifetimes, and improve work environments to enable NNSA to meet operational requirements. The Modernized Operations Alternative also includes proposed projects to reduce greenhouse gases and other emissions. **The Modernized Operations Alternative includes 139 new projects, totaling over 3.4 million square feet, that would be implemented between 2025 and 2038. Under Modernized Operations, NNSA would implement 27 projects involving facility upgrades, utilities, and infrastructure affecting about 925 acres of the LANL site.** Of these 925 acres, up to 795 acres are proposed for installation of up to 159 megawatts of solar photovoltaic arrays across the site. An additional 1.2 million square feet of excess or aging facilities would undergo DD&D under the Modernized Operations Alternative.**

**The Expanded Operations Alternative [the "Preferred Alternative"] includes the actions proposed under the Modernized Operations Alternative, plus actions that would expand operations and missions to respond to future national security challenges and meet increasing requirements. This alternative includes construction and operation of new facilities that would expand capabilities at LANL beyond those that currently exist. **The Expanded Operations Alternative includes 18 additional new projects, totaling about 947,000 square feet, that would be implemented between 2025 and 2038. Under Expanded Operations, NNSA would implement 4 additional projects involving utilities and infrastructure affecting about 46 acres of the LANL site.** Most of the utilities and infrastructure projects would be directly related to proposed projects under the Expanded Operations Alternative. The Expanded Operations Alternative also includes changes in operations, examples of which include revised wildland fire risk reduction treatments and management of feral cattle.**

**The simplest and best way to see these SWEIS "alternatives" is to understand that they aren't alternatives at all. By merely including all these projects in the SWEIS, NNSA will have done, by its lights, sufficient analysis under the National Environmental Policy Act (NEPA) to go ahead with any or all of them.** Anything named in this SWEIS will be "covered" no matter which alternative is chosen in the first Record of Decision (ROD). If it turns out that the ROD omits a particular action named, all NNSA has to do is to issue an amended ROD (AROD) including that particular project. NNSA will then deem, as it has many times before, that no new analysis or consideration of alternatives is necessary.

To create this freedom of government action without any need for project-specific analysis of alternatives (the whole point of NEPA), all NNSA has to do is to get through these hearings and write a final SWEIS. They do not have to agree with any comments or engage with commenters in good faith. They just have to "consider" testimony and comments by putting them in a "comment response document" to protect themselves (more or less) from future litigation and amend the text of the SWEIS as needed to explain why they rejected this or that comment -- or perhaps accepted it in whole or in part, making some trivial correction.

Think of the drafting of this SWEIS as NNSA and LANL making a big list of projects and programs: current, planned, possible, and also certain "stalking horses" (like the proposed plutonium disposition facility, which could be anything big that handles tons of plutonium, creating a "plutonium-shaped" placeholder in NNSA's big NEPA tent). There are also "sweeteners" in their alternatives (e.g. the solar field with batteries -- not however sufficient to avoid the new power line through the Caja del Rio -- killing feral cattle, better fire mitigation).

To decipher this SWEIS and understand it holistically, reassemble the original list from the three seemingly-separate baskets. All three baskets are in the same delivery truck, heading our way. Everything comes with a NEPA "impact-back guarantee," allowing NNSA to exchange one or more projects and programs for others of equal or lesser impact if the first ones don't fit future "needs."

**The most important thing about this SWEIS is that it comes long after, rather than before, the Sept. 2, 2020 decision to add a pit factory to LANL. The present NEPA process is being staged to create a veneer of legitimacy for decisions taken prior to environmental analysis in direct violation of NEPA, and also to avoid proper NEPA analysis in the future. A completed SWEIS is a NEPA "get out of jail free" ticket.**

Enough for now; further discussion is coming in "Part II" next week. See you at the hearings!

Best wishes,

Greg

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2901 Summit Place NE Albuquerque, NM 87106, Phone: 505-265-1200