

## Karen Pletnikoff

The Aleutian Pribilof Islands Association, Inc. provides many services to the Tribal members and communities of our region. Affordable energy is a large consideration these communities, as are the environmental impacts of any energy choice. APIA has long-term concerns for food safety and food and economic security threats related to the Amchitka Island nuclear testing and eventual leakage of these radionuclides into the marine environment. These concerns extend to any activity that brings radioactive materials to or through our region. The State of Alaska's Microreactor Siting Permitting Process should consider several different kinds of impacts, including environmental threats, economic impacts and loss of opportunities, and specific cultural and social concerns. One primary impact is the transit of these reactors through our region and the additional long-term threat posed by these transits, for both installation and decommissioning, should any ship disasters occur; an area still underequipped to address current marine transportation risks. Should a disaster occur, the current remediation and restitution processes are unsatisfactory, with no known restitution projects in the region 20 years after the Selendang Ayu disaster, but millions of unspent dollars in the bank. Future anticipated growth in storminess and sea states will increase these risks. Comparisons of the spill risks from siting radioactive materials energy sources, fossil fuel sources, and renewable energy sources must be included in the permitting documents to allow full consideration of the timeframes, costs, and long-term environmental and human impacts of these comparable energy decisions. These comparisons must include evaluating the potential for the intergenerational loss of lands, waters and resources that could occur with a radioactive material disaster. The process requires both greater demonstrations of response capacity in the form of greater response contracts for installation and decommissioning as well as greater insurance totals due to the exceptionally long-term length of these risks. Separately, future conditions for decommissioning environmental conditions such as weather, storm risk and other ocean conditions scenario planning is required for a comprehensive permitting process that fairly assesses environmental risk.

As a region rich in renewable energy resources with great potential for numerous and large-scale projects, the siting permitting process must account for potential infrastructure and economic competition of a non-renewable energy source owned and operated by outside corporations, especially in those areas with existing or planned infrastructure, local Tribal or ANCSA Corporation investments, or with great renewable development potential like our region, where long-term competition could impede local, regional or state-wide economic opportunities. Competition impacts to other projects must be measured and compared as well as the impacts of decreasing local or region energy demands on potential renewable energy production and projects. Scenario planning is appropriate for environmental conditions, as well as economic and social conditions like non-renewable energy corporation longevity, local and regional financial outcomes on individual and local companies and organizations, and Cultural and social concerns about radioactive materials should be weighted very highly in the siting permitting process. The State of Alaska's important and appreciated recognition of Tribes can only be made meaningful by also recognizing the trust responsibility, rights to self-determination and commitment to environmental justice that comes with our Tribes and our stewardship of our traditional lands, waters and resources. The Aleut people were some of the first to protest the use of our islands for nuclear weapons testing, and these justified concerns remain, even heightened by the ongoing disaster of the Fukushima Daiichi radioactive water releases. The Amchitka Island Nuclear tests that were conducted have left a permanent and ever-growing threat to our traditional foods, our

primary fisheries economy, and our sense of food safety, undermining our cultural food traditions and our ability to confidently pass on our cultural practices to our children and grandchildren. We know how hollow the reassurances are that were given at the time of the Amchitka tests, that these sites won't leak and are also necessary, both of which have been disproven by time and the scientific process. This environmental injustice imposed on our region must never be repeated. Siting permitting must factor these cultural and social concerns among the highest considerations, as these impacts cannot be contained to a single and sole community, or generation, that may benefit from a microreactor's energy.

Thank you for your consideration of these important factors for permitting the siting of microreactors in Alaska.

## Siting of Microreactors - Public Scoping for Regulation Development

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Thank you for your consideration of these important factors for permitting the siting of microreactors in Alaska. Please contact the Aleutian Pribilof Islands Association, Inc.'s Environment & Safety Program Administrator Karen Pletnikoff at (907)276-2700 or [karenp@apiai.org](mailto:karenp@apiai.org) with any follow-up or for additional information.