

Cynthia McNamara

To Whom It May Concern:

I strongly support the New Mexico Environment Department's modification of the WIPP permit, NMED Agency Initiated Modification, or AIM.

The DOE's current storage of legacy waste at Los Alamos National Laboratory is irresponsible and threatens the health and safety of people and their property in New Mexico and neighboring states. The populace will not be safe until all the drums at Area G are emplaced in WIPP on or before July 1, 2028. The waste currently sits in tents on a mesa in a known wildfire zone. One fire -- and there have been many that invaded LANL property -- would create a disaster that could not be recovered from. Given the extreme fire risk conditions that hold sway in the state, a wildfire can occur at any time. Moving the legacy waste NOW from LANL to the Waste Isolation Pilot Plant is urgent and essential.

The proposed permit modifications are needed because, regrettably, the DOE is not currently fulfilling its legal agreements and, in fact, has a history of ignoring them. NMED's modification will force DOE to do what it is legally required to do. To empower NMED to sanction DOE if it fails to move this waste by a set date is essential, and forbidding DOE to ship waste other than LANL legacy waste until it catches up is appropriate and needed.

To facilitate compliance, the proposed modifications give DOE step-by-step instructions on how to fulfill its obligations, and, importantly, the modifications enable NMED to measure and track DOE's progress. The federal agency has already agreed to prioritize the legacy waste at LANL, so it should have no problem meeting the requirements. Unfortunately, the DOE has failed to live up to its word. Instead of offering excuses that this waste requires more effort and money to prepare for WIPP disposal, the DOE must obtain the money it should have decades ago and complete the work it should have decades ago.

Objections to these modifications that are based on job security and local economics are misguided and ill-informed. A nuclear release anywhere in the state would be devastating for all. Per Sandia Labs, vaporized plutonium spread by wildfire would be impossible to clean up. The affected area would be uninhabitable for almost 500,000 years. Homes could not be lived in or sold. (Currently, due to the situation, they are difficult to insure.) The negative effects of a nuclear accident would impact, statewide, agriculture, ranching, commerce, mining, and recreation. Get your kicks on Route 66? No, thanks!

New Mexico was regarded as a sacrifice zone during the development of the atom bomb. It is long past time for that attitude to undergo serious revision. It is time for current risks and dangers to be effectively addressed. The proposed permit modifications are a step in the right direction, and I strongly support them.

Thank you for considering my comments.

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