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Before the Department of Energy creates more nuclear waste in New Mexico, it must first deal with the dangerous legacy waste that already threatens our communities.

At Area G at Los Alamos National Laboratory, approximately 2,500 fifty-five-gallon drums of legacy radioactive waste remain stored above ground and exposed to an increasingly severe wildfire environment. Northern New Mexico is no longer a place where catastrophic wildfire is a remote possibility — it is a recurring reality.

We have already seen this danger again and again:

- The Dome Fire in 1996 rapidly spread through the Jemez Mountains and threatened Los Alamos National Laboratory.
- The Cerro Grande Fire in 2000 burned across Los Alamos National Laboratory property, destroyed hundreds of homes, forced the evacuation of thousands of residents, and released contaminants into the air from burned laboratory lands.
- The Las Conchas Fire in 2011 again threatened LANL and forced another evacuation of Los Alamos.

This is not speculation. This is history.

Climate change, drought, beetle-killed forests, and extreme winds are making wildfires larger, faster, and more unpredictable every year. The Department of Energy cannot continue acting as though these risks are theoretical while radioactive waste sits vulnerable on a forested mesa above Northern New Mexico communities.

If plutonium-bearing waste were dispersed in a major wildfire, the consequences would be devastating and potentially irreversible. According to studies associated with Sandia and other federal research institutions, airborne plutonium contamination is extraordinarily difficult — if not impossible — to fully remediate once widely dispersed into soil, homes, watersheds, and forests.

A major radiological release would threaten:

- Santa Fe
- Los Alamos
- Española
- Pueblo communities
- Regional watersheds and agriculture
- Ranching, tourism, outdoor recreation, and local economies

Families could lose not only their homes, but their ability to insure, sell, or safely live on their land for generations.

Yet instead of treating this legacy waste crisis as the urgent priority it is, DOE is moving aggressively toward expanded plutonium pit production that will create even more radioactive waste.

That is backwards.

The Fire On The Mountain group strongly supports the permit modifications proposed by the New Mexico Environment Department because they finally establish accountability.

The DOE has repeatedly shown that it does not fulfill cleanup commitments unless it is forced to do so through enforceable requirements, measurable benchmarks, and penalties for noncompliance.

The proposed modifications are reasonable and necessary because they:

- Clearly define DOE's cleanup obligations
- Require measurable progress on legacy waste removal
- Allow NMED and the public to track compliance
- Establish penalties if DOE fails to act

DOE itself has already acknowledged that legacy waste cleanup should be prioritized. Now it must follow through.

New Mexico should not become a permanent sacrifice zone where old waste is ignored while new waste is generated.

Before approving expanded plutonium pit production, this Environmental Impact Statement must fully evaluate wildfire-driven radiological release scenarios and require the accelerated removal of legacy waste from Area G.