



West Valley Citizen Task Force

www.westvalleyctf.org

May 5, 2005

Mr. Thomas Barnes
Southern Tier West
4039 Route 219, Suite 200
Salamanca, NY 14779

SUBJECT: Review and Comment, ERA Draft Report "West Valley, NY – Redevelopment of the Nuclear Service Center Site," February 2005

Dear Mr. Barnes:

The Citizen Task Force (CTF) has reviewed the above-referenced report and we appreciate the opportunity to provide our comments below. In general, we feel ERA has missed the mark in meeting the report's primary objective, such as identifying potential new uses for this facility and how the site's attributes can attract, sustain and improve those new uses.

Overall Comments

The report would greatly benefit from a thorough review by a good technical editor. There are many typographical errors, grammatical errors, and awkward or poor wording choices. It would be time consuming for us to identify all of the errors for you. Instead, we will focus our comments on the report's content and methodology.

All source material should be completely referenced and compiled in a bibliography.

Section 1.1 Introduction

This section should not prejudge that the Project is in the process of phasing out site cleanup activities.

Section 1.2 Goals and Objectives

The first bulleted goal or objective should state that much of the liquid high-level waste has been vitrified and its removal is contingent on a federal repository being opened in the West. The fourth bulleted goal needs to state that the remaining staff will be an asset to new businesses that are attracted to the area. The fifth bullet should not imply that contamination will remain or be cleaned up only marginally. In the sixth bullet, what is "biomed"?

Section 1.3 Site Description

Please add a map of the site and surrounding region, including the West Valley Demonstration Project and Western New York Nuclear Service Center boundaries, Erie County, Cattaraugus County, and major roads and highways. Caption the pictures that are included in this section. The reference to LLRW should be to "LLRW and other waste." The site is less than 50 miles from Buffalo. The reference to the March 2003 Notice of Intent (NOI) should be replaced by the original NOI in 1988.

Section 1.5 Existing Facilities

What is the basis for stating that the DOE plans to remove all facilities by 2009?

Section 2. Demographic and Economic Context

Due to its proximity to the site, relevant demographic and economic data should be included for Erie County. A more meaningful approach to this section would be to determine the site's "area of influence." See the 1996 draft environmental impact statement, which used both Erie and Cattaraugus counties as the site's "region of influence" and a 12-mile radius as the primary impact area in its socio-economic analysis.

Rather than just presenting the data, this section should also explain the link between the demographic and economic data and the redevelopment options for the site. For example, the second bullet of Section 2.2.1 says that the highest growth rate by number of businesses was in the industry that comprises professional, scientific, and technical services. What kind of businesses? Where are they? Is there potential for more businesses of this type? Are they hiring? Are they expanding? Can they use the kind of expertise that exists at West Valley?

Section 3. Business and Economic Climate

This section starts out by describing New York's business and economic climate in rather glowing terms, and ends by incongruously explaining how the state is unattractive for business because of its tax structure and offering Pennsylvania instead! We suspect that this description of New York State is heavily influenced by New York City, and not indicative of the economic conditions in western New York State. What is the business and economic climate in Western New York state?

Relevant Erie County data needs to be included in Section 3.

The report needs to explain the link between the regional and local business and economic climate and potential redevelopment options for the site. For example, what is the connection between the lists of existing industrial and business parks in Cattaraugus, Allegany, and Chautauqua Counties and the potential redevelopment options for the West Valley site?

Section 3.2.2. Economic Development

What is the source of the information that supports the first set of bullets in Section 3.2.2? In the second set of bullets, the Seneca Allegany Casino is not a "corridor."

Section 3.4 Site Personnel Resources

Section 3.4 should include site personnel employed by the federal and state governments, and personnel employed by WVNSCO subcontractors. Where do the site personnel live? No appendix is included in our draft. The NYS Labor Department may have public data regarding dislocated employees.

Section 3.4.1 History of Employment

Section 3.4.1 should not prejudice significant reduction in work forced "over the next several years."

Sections 3.7 and 3.8

What is the point of including these sections? The site is not in Pennsylvania, nor will it be anytime soon.

Section 4. Site Reuse Options

How were these options identified? Is corn-based or soy-based fuel production practical considering the regional growing season and soils? Is there enough biomass in the area to support a viable energy production facility?

Section 4.1 Site Issues

This section does not incorporate the comments provided by our group at the February 24 meeting. Do soils exist on the site that are hydric or prime farmland? Where are the wetlands? The section should not prejudice or imply that contamination will remain or be only marginally cleaned up. Slopes should not be prejudged to be a negative feature; they may be a positive feature for recreational use or chalet-type housing.

It may be that light use, or no use, will be appropriate for portions of the site. The potential for reusing portions of the site for recreation or natural preservation should be acknowledged. The balance of the site has been protected from outside interference since the early 1960s and its ecological value as an undisturbed natural habitat should not be discounted. What is the possibility of establishing an ecological research station? The unused north-south railroad presents a "rails to trails" opportunity. What is the potential for trout anglers, hikers, campers, rock climbers, and bird watchers, for example? The report should discuss that the land's pre-WNYNSC use was agricultural, and that some portions of the balance of site could be returned to that use.

Section 4.1.1 Biofuel

4.1.1 The biofuel reuse option should discuss sources of feed stocks such as corn, barley and wheat in relation to their local availability.

Section 4.2 LEED – Green Buildings

Section 4.2. What is the connection between this description of the LEED – Green Buildings program and the redevelopment options for the site?

It is our goal to identify and promote a future use for the site that utilizes the site characteristics and personnel in a way that fits well with the community character, available infrastructure and utilities, and the talents of the site personnel. The reuse of the site should cause no further environmental degradation, or ideally, improve the overall environmental quality of the area. We would like to be notified of how ERA proposes to meet the primary objectives of the site re-use study and utilize the comments we have submitted. We look forward to working with you, reviewing the next draft in the near future, and further evaluating productive re-use options for the site.

Sincerely,



Gayla Gray
On behalf of the Citizen Task Force

cc: Paul L. Piciulo, Ph.D., NYSERDA – Director/West Valley Site Management Program
John Swailes, U.S. DOE – Director/WVDP
Gerard J. Fitzpatrick, Chair, Cattaraugus County Legislature
Tom Livak, Cattaraugus County Department of Planning and Tourism
John Marshall, U.S. Department of Commerce, Economic Development Administration
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