



WEST VALLEY CITIZEN TASK FORCE

www.westvalleyctf.org

October 13, 2005

Thomas M. Barnes
Senior Regional Economic Development Coordinator
Southern Tier West Regional Planning and Development Board
Center for Regional Excellence
4039 Route 219, Suite 200
Salamanca, New York 14779

Dear Mr. Barnes:

This letter contains the West Valley Citizen Task Force (CTF) comments on the “*Final Report Draft - West Valley, NY - Redevelopment of the Nuclear Service Center Site,*” dated September, 2005.

General Comments:

The CTF is reserving comment on the Executive Summary until after it is written and we have time to review it. The Executive Summary should give the basis for the report’s conclusions and explain the framework that ERA worked within. For example, if an evaluation of recreational uses was not considered appropriate for this study, the rationale for this decision should be given so that readers do not receive the impression that recreational uses are not considered viable alternatives for use of the site.

As the owner of the site, the New York State Energy Research and Development Authority (NYSERDA) must concur and support future use recommendations. The U.S. Nuclear Regulatory Commission (NRC) must release land from their license before portions of the site can be redeveloped.

The CTF has expressed the opinion that the full site needs to be cleaned up to avoid future contamination of local communities, the Seneca Nation, the drinking water of downstream cities such as Buffalo, and the Great Lakes generally.

The CTF prefers a holistic approach to site redevelopment, but recognizes that some portions of the site may be redeveloped before other areas. However, the Task Force does not want this development to prejudice decision making on future cleanup levels or other redevelopment of the site.

Recreational use of the entire site should be listed as a potential option.

The Task Force is concerned that certain recommended reuses could preclude other future uses. The proposed anthrax decontamination technology and the munitions materials reprocessing reuses raise concerns for some CTF members. The CTF members could not reach consensus on appropriate site reuses at this time.

Specific Comments:

Page 7, Section 1.1, Introduction - The report says incorrectly that WVDP "is in the process of phasing out " both vitrification and site clean-up activities. Vitrification is done, but much remains to be done on clean-up. The decision on degree of clean-up will be based on the Environmental Impact Statement (EIS) Process.

Page 7, Section 1.2, Goals and Objectives (last bullet) - Add the underlined language (and delete the ~~strikeout~~ terms) in the following sentence:

“Some of those responding indicated that this reality check must take into account the constraints of contamination and perceived contamination in the core area, and that ~~the~~ reuse in the near future must be cognizant of ~~these~~ existing contamination.”

Page 9, Section 1.3, Site Description (Figure 1) - The Western New York Nuclear Service Center (WNYNSC) is misplaced (too far East) and the map needs to include Buttermilk Creek along with other creeks that are shown. The map should include relevant communities like Springville and West Valley and should exclude less relevant place names like Elma, Billington Heights, and Angola-on-the-Lake.

Page 9, Section 1.3, Site Description (Figure 1) - The WNYNSC is much closer to the creek and Route 219 than shown. Map should show at least the large communities downstream, beginning with Springville and including Gowanda, the Seneca Nation territory as well as Hamburg and lakeside communities other than Buffalo.

Page 10, Section 1.3, Site Description (last paragraph) - It is incorrect to say that the EIS prepared under the 1988 Notice of Intent "will revise the 1996 Draft Environmental Impact Statement." These are both part of the same EIS.

Page 12, Section 1.5, West Valley Demonstration Project Existing Facilities - The statement that: “DOE will leave in place facilities that can be cleaned if the reuse plan requests this” should be clarified.

Pages 12-13, Section 1.5, West Valley Demonstration Project Existing Facilities - The report fails to mention (but should) the two water reservoirs located on the WNYNSC. These are an important part of the facility and its utility infrastructure.

Page 13-14, Section 1.7, Community Involvement - Change the date in the sentence “Since 1997 ~~1998~~, the Task Force has met regularly ...”

Page 43, Section 3, Business and Economic Climate - This section needs to reflect a better geographic balance among Cattaraugus, Erie, Wyoming, Chautauqua, and Allegany Counties. The WNYNSC is located in Erie and Cattaraugus counties and most of its employees reside there. However, Chautauqua, Allegany, and Wyoming counties also are impacted and should be included.

Page 44, Section 3.2.1, Accessibility - The report fails to mention (but should) the major airport that serves the WNYNSC: the Buffalo Niagara International Airport.

Page 51, Section 3.2.2, Economic Development (Ashford Business and Education Park Site Characteristics) - In regards to the Ashford Office Complex, the report states that “the Department of Energy abandoned the original building...” This is outdated information.

Page 57, Section 3.4, Labor/Site Personnel Resources - The reports states that “the workforce of 473 employees at the end of 2004 is expected to be reduced by 100-150 during 2005.” This is outdated information.

Page 63, Section 3.6, State Business Tax Climate (Table 25) - The state of Rhode Island should be spelled with a "H".

Page 63, Section 3.7, Tourism - ERA's belief that tourism cannot and should not be part of the redevelopment strategy for the WVDP is inappropriate and unfounded. The report's authors should not be prejudiced against the full clean-up of this land.

Page 64, Section 4, Site Issues (first bullet) - The report should not say that the “State and federal objectives are to clean and seal the contamination.” The statement about sealing contamination is either inaccurate or needs to cite specific written sources for these so-called state and federal objectives. The decision on degree of clean-up will be based on the EIS. The CTF has expressed the opinion that the full site needs to be cleaned up to avoid future contamination of local communities, the Seneca Nation territory, the drinking water of downstream cities such as Buffalo, and the Great Lakes generally.

Page 64, Section 4, Site Issues (first bullet) - The reports states “there is virtually no interest in or prospects for a future reuse of the core processing area.” One would think there would at least be “interest” if not perceived “prospects.” Even though we have had many indications that authorities expect the tanks to remain and the plant to be rubblized and sealed in place, the CTF has never agreed to the idea to seal anything in place. The Task Force is waiting for the EIS and understanding the real costs of leaving the waste in the ground for many thousands of years before any long-term decision can be made.

Page 64, Section 4, Site Issues (fourth bullet) - When people choose resort areas they may be looking for recreational activities, such as skiing or a waterpark (indoor or out), but they may also want proximity to other vacation destinations. People who rent condos count a beautiful view of the hills and valleys as a real plus in choosing a site for a vacation.

Page 64, Section 4, Site Issues (fifth bullet) - The CTF appreciates that ERA is not trying to come up with a plan for the whole site, but in the concluding sentence of that section they assume at least a “green field” reuse. Yet, ERA seems to be closing out some options available even to green field areas. Naturally, they aren’t assuming reuse of contaminated areas, but the CTF is determined to eliminate that scenario, or reduce it as much as humanly possible.

Page 65, Section 4.1.2, Slope - Steep slopes are considered a negative feature by ERA, but are typically an attractive feature for tourism-related reuse. Tourism should not be rejected as a reuse option.

Page 71, Section 4.1.7, Contamination - Change the following sentence by adding the underlined text: “The map shows areas within the study to be avoided in the near future due to known contamination until cleanup is completed.”

Pages 73-74. Section 4.1.9, Topography (Figures 17-18) - What is the purpose of the out-of-date topographic maps shown on these two pages? Newer quadrangles are available.

Page 82, Section 6.2, Land Transfer - The report states that “This transfer should be considered well in advance of the current projections for completion of the remediation of the site so that the marketing of the sites can be started with specific details provided to targeted business.” What does this mean?

Thank you for the opportunity to submit comments.

Sincerely,



Joseph J. Patti
On Behalf of the West Valley Citizen Task Force

cc: U.S. Senator Charles Schumer
U.S. Senator Hillary Clinton
U.S. Representative John Kuhl, Jr.
U.S. Representative Thomas Reynolds
U.S. Representative Brian Higgins
U.S. Representative Louise Slaughter
NYS Senator Catharine Young
NYS Assemblyman Joseph Giglio
Peter Smith (NYSERDA President)
Paul Piciulo, Ph.D. (NYSERDA - Director/West Valley Site Management Program)
Hal Brodie (NYSERDA - Deputy Counsel)
Robert Warther (U.S. DOE - Director/Ohio Field Office)
John Swailes (U.S. DOE - Director/West Valley Office)
WVCTF Members