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## *Memorandum*

**Date:** April 9, 2026  
**To:** Buckman Direct Diversion Board  
**From:** Brad Prada (BDD Facility Manager)  
Paul Drakos, Jim Riesterer, Boot Pierce, GZA GeoEnvironmental, Inc. d/b/a  
Glorieta Geoscience (GGI)  
Nancy R. Long, Kyle Harwood (BDD General Counsel)  
**Subject:** Summary of NNSA issued 2026 Final Site-Wide Environmental Impact Statement  
and Record of Decision for Expanded Operations at Los Alamos National  
Laboratory

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On April 9, 2025, the Buckman Direct Diversion Board (BDDDB) provided comments on the Los Alamos National Laboratory (LANL) DRAFT Site Wide Environmental Impact Statement (SWEIS) for Continued Operation of Los Alamos National Laboratory. On March 25, 2026, the National Nuclear Security Administration (NNSA) issued the Final Site-Wide Environmental Impact Statement and Record of Decision (ROD) for Operations for Los Alamos National Laboratory. The ROD evaluated three alternatives for operations: No-Action, Modernized Operations, and Expanded Operations. The ROD determination was to implement the Expanded Operations Alternative to manage Los Alamos National Laboratory in the coming years through 2038.

GZA GeoEnvironmental, Inc., dba Glorieta Geoscience (GGI) has reviewed the SWEIS to determine if the BDDDB concerns and recommendations were addressed in the documents. The comments and recommendations of the April 9, 2025 BDDDB letter are highlighted below along with a summary of sections and comments from within the SWEIS that address them.

### **Summary**

The SWEIS report discussed actions under the Expanded Operations ROD in a general nature. In the Introduction of the report (Section 1.0 of Volume 1) the SWEIS states that “The SWEIS is a “site-wide NEPA document,” which means that it is a broad-scope environmental impact statement that is programmatic in nature and identifies and assesses the individual and cumulative impacts of ongoing and reasonably foreseeable future actions at the Laboratory (per 10 CFR 1021.104).

The NNSA discussions within the SWEIS were framed in general terms of how they may address operations under the expanded operations ROD without providing precise or clear details or plans of action.

Public comments and comments to the DRAFT SWEIS, such as those provided by BDDDB in the April 9, 2025 letter, were aggregated by topic and responses were provided in Appendix N of the SWEIS.

BDDDB comments #1 through #5 (see below) were not directly discussed in the SWEIS but were addressed obliquely in discussions in general terms of how NNSA may address the situations without providing a precise or clear plan of action. In many cases the SWEIS references

previous documents, environmental assessments, and consent orders for more specific operational direction.

BDDB comment #6 and #7 related to wildland fires risk reduction and feral cattle were addressed in slightly more detail with further references to the *Wildland Fire Mitigations and Forest Health Plan* and *Feral and invasive Cattle Management Plans*.

BDDB comment #8 related to the installation of the Emergency Notification System gage located in Los Alamos Canyon was not addressed in the SWEIS. However, BDD staff and GGI are currently working with LANL on installation and operations of the camera located at E110.7.

**1. BDDB Recommendation #1 - Expedite schedules for all environmental remediation activities.**

- a) The SWEIS, in referring to site characterization and environmental monitoring, indicates that “LANL may also engage in expedited cleanups, such as limited removals to facilitate site characterization, interim measures (as defined in RCRA), or full-scale cleanup or closure of sites recognized as having a perceived public risk associated with them” (I.2.1.1, Page I-18, Volume 2). However, the documents provide no details as to how that would be achieved.

**2. BDDB Recommendation #2 - Restart the Hexavalent Chromium Plume remediation IM program incorporating recommendations from the IRT.**

- a) There is no mention of the Independent Review Team (IRT) recommendations discussed in the SWEIS.
- b) The SWEIS indicates that LANL would continue to implement the Interim Measures (IM) and continue cleanup of legacy contamination areas. For the Chromium plume remediation area, LANL provided the following:
  - i. “The principal regulatory driver for legacy environmental cleanup at LANL is the 2016 Consent Order (as modified), while legacy waste management and disposition is conducted in accordance with DOE Orders and other federal requirements. This SWEIS considers legacy cleanup activities at LANL at a site-wide level.” (A.2.1.1, Page A-23, Volume 2)
  - ii. “As identified in Section A.1.4, EM-LA has prepared the *Chromium Interim Measures and Final Remedy Environmental Assessment* (Chromium Final Remedy EA) (DOE 2024) to evaluate alternatives for the final remedy for the hexavalent chromium plume in Mortandad Canyon.” (A3.2.2.1, Page A-90, Volume 2)
  - iii. The Chromium Final Remedy EA provides four options representing different remediation methods and technologies that are intended to provide maximum flexibility to adjust to potential or unanticipated events (DOE 2024). These options and methods/technologies can selectively be implemented to improve the effectiveness of remediation, the cost of remediation, or minimize potential effects resulting from the cleanup activities.” (A.4.4.2.2, Page 201, Volume 2).

**3. BDDB Recommendation #3 - Resubmit to the OSE a complete water rights application for all groundwater diversions.**

- a) Water rights are discussed briefly under Section 6.4.10 and Appendix N, Comment Category 5-I. No mention of an OSE application is made. The SWEIS states that the projected water consumption would be approximately 5,109 acre-feet which would remain below the water right of 5,541 acre feet. (Appendix N, Comment Category 5-I, Page N-30, Volume 2)

- i. Note: Section 6.4.10 states that the projected water consumption for Los Alamos County is 5,138 acre-feet, or 7% below the water rights of 5,541 acre-feet while Appendix N references Section 6.4.10 but states that the projected water consumption for Los Alamos County is 5,109 acre-feet, or 8% below the water rights of 5,541 acre-feet.*
- 4. BDDB Recommendation #4 - Develop concrete proposals for additional and immediate characterization and remediation of the PFAS plume.**
  - a) There is a discussion of PFAS contamination within the alluvial and intermediate aquifer in Pueblo Canyon where the SWEIS states that, “LANL will continue to monitor for PFAS at these locations” (A 4.4.2.2, Page A-206, Volume 2).
  - b) The SWEIS also states, “Given the understanding that PFAS health effects are rapidly evolving in tandem with increasing regulatory attention to PFAS, the Laboratory will continue to evaluate and consult with NMED on whether additional sampling for PFAS constituents is required.” (A-4.4.2.2, Page A-196, Volume 2)
- 5. BDDB Recommendation #5 - Design protective measures that secure areas of surface and near surface legacy waste from post-fire mobilization and remobilization.**
  - a) While legacy waste and environmental cleanup were discussed numerous times within the document, no discussion related specifically to remobilization of legacy waste was found in the documents. Wildland fire mitigations and forest health plan were described in A.2.2.4.13.5 and D.3.10.2, and Risk Reduction Treatments were included in in A.3.4.2.
  - b) Section 5.14.5.2 (page 5-137, Volume 1) evaluates potential estimated consequences of wildland fire events on facilities with radiological materials, including mentions of TRU waste containers.
  - c) Section A.4.4.1.5, (page A183) describes sediment monitoring, section A.4.4.1.3, (page 178) describes permitting and section A.4.4.1.4 ((page A-180) describes engineering controls to prevent or minimize sediment and contaminant migration to the Rio Grande.
- 6. BDDB Recommendation #6 - Actively pursue wildland fire risk reduction treatments.**
  - a) Wildland fire reduction treatments were discussed in sections 3.4.2, page 3-37 and 5.6.4, page 5-50 (both in Volume 1) and as an option under the Expanded Operations Alternative in section A.3.4.2 (page A-131). The Wildland Fire Risk-Reduction Program is described in section 5.2.2.3, page 5-21 in Volume 1. Modifications to wildland fire risk-reduction treatments are mentioned in section 5.8.3.4, page 5-73, Volume 1. Wildland fire mitigations and forest health plan were described in section A.2.2.4.13.5 (page A-69) and D.3.10.2 (page D-90), and fire Risk Reduction Treatments are included in section A.3.4.2 (page A-131).
- 7. BDDB Recommendation #7 - Manage feral cattle more effectively.**
  - a) Feral and invasive Cattle Management was discussed in section 5.6.4, pages 5-50 - 5-51 in Volume 1 and as an option under the Expanded Operations Alternative (A.3.4.2, Page A-133, Volume 2).
- 8. BDDB Recommendation #8 - Install the BDD-requested additional ENS gage in Los Alamos Canyon to adequately inform BDD operators if diversions need to be shut down.**
  - a) No mention of the ENS system was found in the SWEIS

**Further Actions for BDDB consideration:**

- No action
- Prepare a follow up letter to the DOE/National Nuclear Security Administration (NNSA) expressing concern regarding the lack of detail of the SWEIS document, aggregation of

comments by subject matter, and lack of responses to individual public comments. There is no official comment period because the ROD has been finalized, so the comment letter would be to provide a record of BDDDB's position and is unlikely to be acted on by NNSA.

- Prepare a follow up letter to LANL discussing the BDDDB opinion that a 12-year life cycle of the SWEIS is too long and that the rapidly changing nature of the facility operations under the Expanded Operations Alternative warrants a shorter life cycle for SWEIS development.