



Nevada Desert Experience

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Interfaith Resistance to Nuclear Weapons

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Comments Regarding the Scope of the Site-Wide Environmental Impact Statement (SWEIS) for the Nevada Test Site (NTS)

These comments are submitted in the interest of developing alternatives to more activity at the Nevada Test Site and to promote a comprehensive Draft SWEIS that includes “potential impacts and issues both on and off the Nevada Test Site.”

It is very important that the environmental impact of work done at the NTS be viewed in the context of the entire nuclear weapons complex, and not be divorced from the social and environmental problems created by nuclear programs in general. The “scope” of the SWEIS needs to be broad because the damage caused by nuclear development is extremely long-term, and can occur in an instant whether by accident or intention. The environmental harm inherent in the existence and maintenance of nuclear weapons underlies the separate arguments put forward below, and makes these larger issues relevant for the purposes of determining the scope of the NTS SWEIS.

1. The scope of the SWEIS needs to include the consideration of closing the NTS in its entirety. Nothing in the world can cause as much environmental devastation in as short a time, lasting for as long a time as nuclear weapons. Closing the Test Site would be a concrete, confidence-building sign to the world that the United States will not enlarge or re-shape its nuclear stockpile and is sincere in working for nuclear disarmament.
2. The Western Shoshone National Council should have the final say regarding any of the work mentioned in this message or the SWEIS. The Nevada Test Site land rightfully belongs to the Western Shoshone Nation, and their wishes should be paramount. The Treaty of Ruby Valley (1863) grants their Nation the NTS land and more. Special use by the US military and for other specific uses that have not been negotiated with them are thus illegitimate. The Western Shoshone National Council doesn't support the continued contamination of their land nor its ongoing use for the preparation of nuclear war.
3. Specific proposals included in the SWEIS need to be analyzed for the impact they would have on the prospects for the US to move the world towards reduction and elimination of nuclear weapons. The environmental cost of nuclear weapons is so large as to necessitate its consideration at every turn. Proposed NTS work needs to ensure that it doesn't hinder successful negotiations with other countries and groups to prevent the spread of nuclear weapons. NTS projects must lead the country forward in its obligation to eliminate nuclear weapons from the US arsenal. The Nuclear Non-Proliferation Treaty (NPT) makes any testing of, or improvements to nuclear weapons a violation of international law and hence the laws of the United States. Maintaining our ability to develop new generations of nuclear weapons undermines our moral position as a nation in the face of any other country developing nuclear weapons capabilities. Article VI of the NPT clearly binds the United States (and other nuclear states) to be disarming, not merely promoting non-proliferation.

4. No quantity or quality of environmental education programs like "Operation Clean Desert" with its "Dr. Proton" and "Adam the Atom" justify keeping the NTS open. There is no single polluter that compares with the United States military. Nothing in the world can cause as much environmental devastation in as short a time, with such long term consequences as nuclear weapons. Any educational programs conducted by the NTS or its managers must first and foremost emphasize the toxic impacts of the nuclear complex on the land and lives of nearby people as a warning against further contamination and destruction.
5. If not closed in its entirety, the Nevada Test Site should be closed to all but environmental restoration and containment of material already there. No new hazards or toxins should be introduced to this environment. Specifically, no more low-level or mixed-level waste sites should be opened.
6. At least one of the test shot sites needs to be characterized fully to track off-site drift of contaminants. Over 1000 nuclear detonations have occurred at the NTS already. Monitoring wells upstream of contamination sites can establish a baseline but additional systems are needed around Pahute Mesa and beyond. Evidence of plutonium drifting much faster than expected needs further study. Cumulative exposure also effects other potential uses in and around the NTS.
7. While individual countries have an interest in being able to verify treaty compliance, the United States needs to focus more on taking concrete steps towards disarming than worrying about other countries. Any project such as the Nonproliferation Test and Evaluation Complex (NPTEC) needs to be conducted in support of the International Atomic Energy Agency's (IAEA) mandate to monitor NPT compliance. The Comprehensive Test Ban Treaty (CTBT) Organization has the task of monitoring compliance with the CTBT, not the United States, which still hasn't actually ratified it in the Senate. Given the history of "downwinders" being harmed by fallout from the NTS, the actual safety provided by the NPTEC site's "large safety zone for public protection" needs to be real and substantial. As stated previously, the Western Shoshone Nation needs to approve of all uses of the NTS especially in cases involving introduction of new toxins into the environment.
8. The Tonopah Test Range (TTR) should cease all activities related to R&D and testing of nuclear weapons components and delivery systems as inconsistent with the mandate of disarmament. The same is true for the Joint Actinide Shock Physics Experimental Research (JASPER).
9. No new sub-critical tests should be carried out. Such tests, under the guise of Stockpile Stewardship, undermine US credibility vis a vis the elimination of its nuclear arsenal.
10. The Renewable Energy Option has potential for positive use, but the Western Shoshone should determine what happens at the NTS.
11. The lives of workers at the NTS are important, but developing or maintaining nuclear weapons shouldn't be viewed as a jobs program.

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